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GRAZING ENVIRONMENTAL IMPACT STATEMENT
FINAL

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BUREAU OF LAND MANAGEMENT
Boise District Office
230 Collins Road
Boise, Idaho 83702

IN REPLY REFER TO
1792
Owyhee EIS

Dear Reader:

Enclosed for your review is the Final Owyhee Grazing Environmental Impact Statement. The statement was prepared by the Bureau of Land Management pursuant to Section 102(2)(C) of the National Environmental Policy Act of 1969.

The statement describes and analyzes the economic, social and environmental effects of proposed grazing management on 1,014,296 acres of public land in southwestern Idaho and southeastern Oregon. Seven alternatives are considered.

This final statement differs from our usual procedure in reprinting the entire draft statement. This statement includes only those changes that are necessary on the Draft EIS and responses to public comments received on the Draft EIS.

This document, used with the draft statement, which was distributed to the public on April 10, 1980, constitutes the Final Environmental Impact Statement.

This document includes a summary of the proposed action and five alternatives that were analyzed in the Draft EIS as well as the description and analysis of two additional alternatives that were developed to respond to public comments.

This final statement is not a decision document; it merely discloses the probable impacts to the human environment that the proposed action and alternatives would create. The decision on the action to be taken will be based on the analysis contained in the Final EIS, BLM's manpower and budget constraints, public concerns and comments and other multiple-use resource objectives or programs for the area. Decisions cannot be enacted before 30 days following the filing of the final statement with the Environmental Protection Agency and distribution to the public. A summary document that outlines the management direction for the Owyhee EIS area will be prepared and made available as soon as a decision is reached; tentatively in late 1980 or early 1981. More specific decisions will subsequently be developed on an allotment-by-allotment basis.

Thank you for your interest and participation.

Sincerely yours,

James Gabettas
James Gabettas
Acting District Manager

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OWYHEE GRAZING
ENVIRONMENTAL IMPACT STATEMENT

( ) Draft (X) Final Environmental Impact Statement

1. Type of Action: (X) Administrative ( ) Legislative

2. Responsible Agencies:

   a. Lead Agency: Department of the Interior, Bureau of Land Management

   b. Cooperating Agencies: None

3. Abstract: The Bureau of Land Management proposes to implement a grazing management program on 1,014,296 acres of public lands in Owyhee County, southwestern Idaho and Malheur County southeastern Oregon. This statement analyzes the economic, social and environmental effects of the proposal and seven alternatives. The proposal and alternatives analyze different levels of vegetative allocations to wildlife, livestock, wild horses and other uses. It analyzes alternative methods by which livestock grazing would be managed as well as necessary support facilities (i.e., water development, fencing, brush control and revegetation projects).

4. Comments Have Been Requested and Received from the Following:

   See Page 16 - Comments on the draft statement were received from those agencies, organizations and individuals listed on Table 2 (page 58).

5. Date Draft Statement Made Available to EPA and the Public:

   Draft: April 10, 1980

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OWYHEE GRAZING
ENVIRONMENTAL IMPACT STATEMENT

Prepared by
BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR

Idaho State Director, Bureau of Land Management

TABLE OF CONTENTS

Page

SUMMARY 1

CONSULTATION AND COORDINATION 16

DESCRIPTION OF ALTERNATIVE 6 19

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE 6 25

Assumption and Analysis Guidelines 25

- Vegetation 25
- Soils 25
- Water Resources 25
- Terrestrial Wildlife 26
- Aquatic Wildlife 27
- Wild Horses 27
- Cultural Resources 27
- Wilderness 28
- Visual Resources 28
- Recreation 29
- Livestock Grazing 29
- Economics 30
- Social Conditions 31

DESCRIPTION OF ALTERNATIVE 7 32

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE 7 40

- Vegetation 40
- Soils 44
- Water Resources 45
- Terrestrial Wildlife 47
- Aquatic Wildlife 49
- Wild Horses 49
- Cultural Resources 49
- Wilderness 49
- Visual Resources 49
- Recreation 50
- Livestock Grazing 50
- Economics 51
- Social Conditions 55

PUBLIC COMMENTS AND RESPONSES 57

DRAFT EIS TEXT CHANGES 103

LIST OF TABLES

Table No.		Page No.
1	Comparative Impact Summary (Projected 20-Year Impacts)	12
2	Comment Letters and Hearings Testimony	58
3	Summary of AUM Allocation for Alternative 6	29
4	Alternative 7 - Proposed Use and 20-Year AUM Projections	34
5	Project Development and Maintenance Cost - Alternative 7	37
6	Alternative 7 - Project Development	38
7	Condition Class Summary, Alternative 7, for Public Lands in EIS Area	43
8	Alternative 7, Useable Forage Summary	43
9	Alternative 7, Condition Class in 20 Years	44
10	Summary of Projected Changes in Watershed Conditions on Allotments Important to Water Resources	46
11	Wildlife Summary - Alternative 7	48
12	Recreation Use	50
13	Summary of AUM Allocation for Alternative 7	51
14	Owyhee EIS Area, Size Group Data, Alternative 7	52
15	Owyhee EIS, Income Changes by Group, Alternative 7	53

MAPS

Map No.		
1	General Location of EIS Area	2
2	Project Development - Alternative 7 ...... following page	38

SUMMARY

The Bureau of Land Management proposes to implement an intensive range management program on 1,014,296 acres of public land in southwestern Idaho and southeastern Oregon (Map 1). The purpose of the proposal is to improve soil, vegetation, watershed, wildlife and other resource conditions and provide adequate forage to stabilize and strengthen the local livestock industry. The Draft EIS analyzed the proposal and five alternatives that were developed to assess different levels of wildlife, livestock and wild horse use. Based on public comment, alternatives 6 and 7 were developed and assessed in the Final EIS. Alternative methods by which livestock grazing would be managed as well as necessary supporting facilities (i.e., water development, fencing, brush control and revegetation projects) are addressed.

Alternatives considered are 1) No Livestock Grazing, 2) No Action, 3) Maximize Wildlife and Watershed Conditions, 4) Sixty Percent Use Levels, 5) Maximize Livestock Use, 6) and 7).

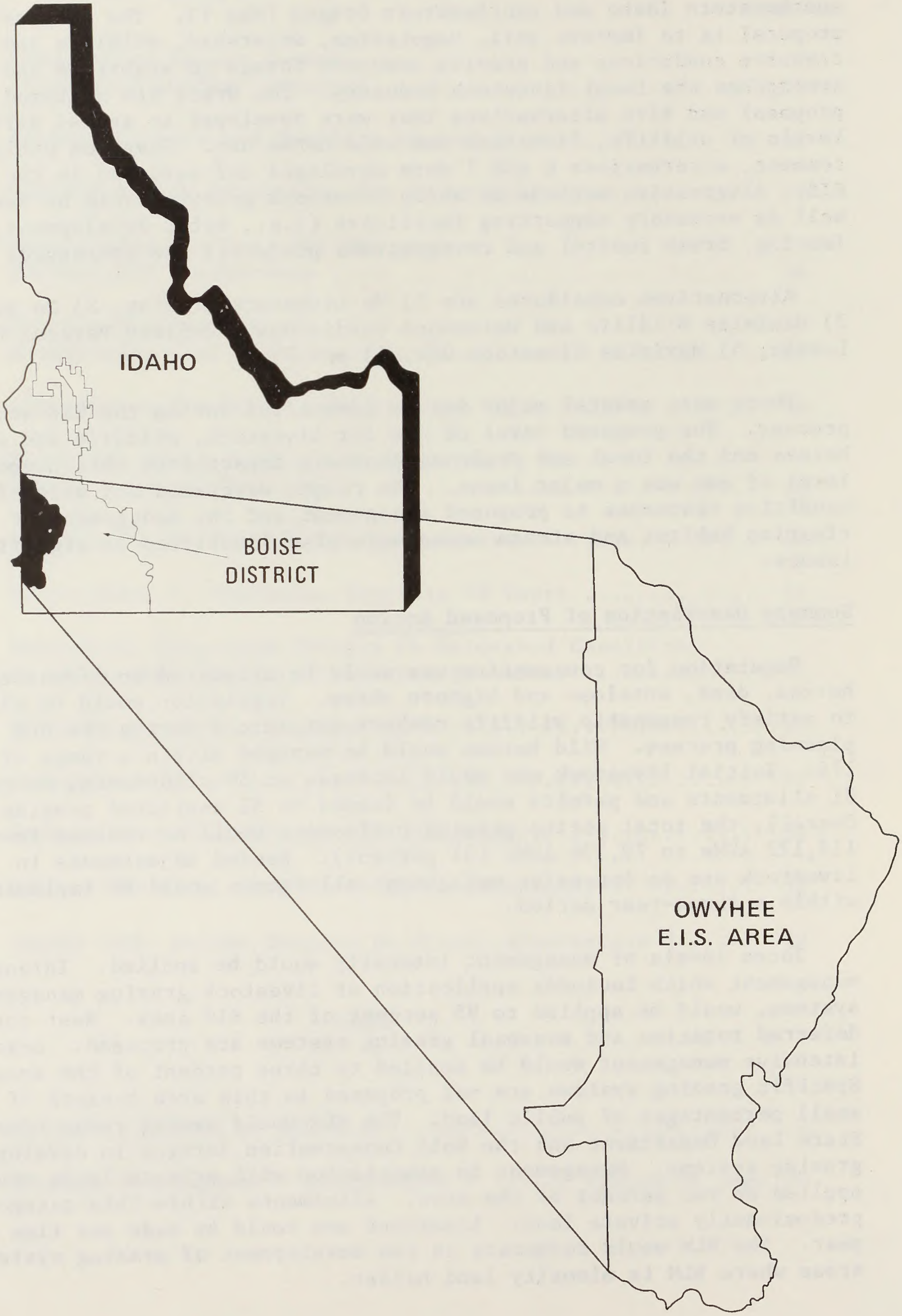
There were several major issues identified during the EIS scoping process. The proposed level of use for livestock, wildlife and wild horses and the local and regional economic impact from this proposed level of use was a major issue. The range, watershed and wildlife condition responses to proposed management and the management of riparian habitat and stream areas were also identified as significant issues.

Summary Description of Proposed Action

Vegetation for consumptive use would be allocated to livestock, wild horses, deer, antelope and bighorn sheep. Vegetation would be allocated to satisfy reasonable wildlife numbers determined during the BLM planning process. Wild horses would be managed within a range of 118 to 178. Initial livestock use would increase on 30 allotments, decrease on 81 allotments and permits would be issued on 32 unalloted grazing areas. Overall, the total active grazing preference would be reduced from 113,122 AUMs to 78,336 AUMs (31 percent). Needed adjustments in livestock use on intensive management allotments would be implemented within a three-year period.

Three levels of management intensity would be applied. Intensive management which includes application of livestock grazing management systems, would be applied to 95 percent of the EIS area. Rest rotation, deferred rotation and seasonal grazing systems are proposed. Less intensive management would be applied to three percent of the area. Specific grazing systems are not proposed in this area because of the small percentages of public land. The BLM would assist range users, the State Land Department and the Soil Conservation Service in developing grazing systems. Management in association with private lands would be applied on two percent of the area. Allotments within this category are predominantly private land. Livestock use could be made any time of the year. The BLM would cooperate in the development of grazing systems in areas where BLM is minority land holder.

MAP 1



Special riparian management practices would be applied to 64 fenced stream miles. Log structures would be placed on streambanks along 86 stream miles to discourage livestock trailing along stream bottoms. Implementation of the proposal would require development of 81 springs, 90 reservoirs, 24 miles of pipeline, 100 watering troughs and 153 miles of fence. Thirteen miles of fence would be removed. Sagebrush and juniper control is proposed on 172,000 acres. An additional 67,000 acres would receive brush control and be artificially revegetated.

Proposed Action - Environmental Consequences

Competition for forage between wild horses, livestock and wildlife would decrease. Vegetative trends would stabilize or improve on most areas. Vegetative treatment practices would replace sagebrush and juniper with grass and forbs. Useable forage would increase from 82,817 Animal Unit Months (AUMs) to 146,757 AUMs. Cover increases from improved range conditions on native range and land treatment areas would cause a nine percent decrease in annual erosion rates. The overall watershed condition would improve slightly.

Wildlife habitat would improve on most areas. The proposal would reduce forage competition and benefit mule deer, antelope and bighorn sheep populations. There would be season-of-use conflicts with livestock during the late fall on mule deer winter ranges (23 allotments). This would adversely impact the deer herd on these allotments.

Providing deferred and rest pastures throughout the EIS area would periodically eliminate competition on critical nesting and brood rearing areas. Sage grouse and waterfowl populations would benefit.

Fisheries would improve on most streams, with the most significant improvement occurring on fenced streams. The fisheries habitat condition would improve to good on 58 of the 64 fenced stream miles within ten years. Unfenced streams would improve at a slower rate, but most would be in fair condition in twenty years. Fisheries associated water quality and quantity factors would improve on most streams. Fish food abundance would improve and fish populations would increase.

Wild horses would benefit from lower livestock use levels. Sixteen miles of new fence would limit movement of horses and confine them during the livestock grazing season. Additional water development and vegetative treatment would expand wild horse distribution and provide additional forage.

Slight adverse impacts to some cultural resource sites would occur from increased livestock concentrations in previously ungrazed or lightly grazed areas. Some cultural resource site deterioration from erosion would cease.

Development of range improvements and establishment of grazing systems would have a slight adverse effect on visual resources. Most proposed projects, however, are located in the lower quality visual resource management areas. The quality of hunting and fishing opportunities would improve. Hunting and fishing use would increase by 20,400 activity occasions above current trend levels. The quality of off-road vehicle use would slightly decrease.

Most livestock operators would be faced with initial short-term reductions. In the long-term, livestock use would be approximately 29,000 AUMs above the current active preference of 113,122 AUMs. Initial livestock reductions would cause adverse social impacts to those operators receiving reductions.

Income losses over the twenty-year period would be significant. The net present worth of rancher income losses would be -$3.3 million. The net present worth of regional, state and national income losses would be -$6.5 million. Approximately 21 of the 83 operators would have difficulty remaining in business.

Alternative #1 - No Livestock Grazing

Under this alternative, all livestock grazing would be eliminated. Forage on public lands would be reserved for wildlife and wild horses. Wild horses would be allowed to increase to 338. All fences except boundary fences around the EIS area and wild horse area would be removed. No project development or vegetative treatment projects for livestock management would be allowed.

Alternative #1 - Environmental Consequences

Elimination of livestock grazing would slowly improve vegetation conditions. Downward trending areas would stabilize, static areas would exhibit upward trends, and areas in fair or good ecological condition with upward trends would improve one condition class. Riparian vegetation would show significant improvement.

Soil erosion would decrease eighteen percent from existing rates as a result of increased vegetative cover and litter. Watershed conditions and wildlife habitat would improve. Elimination of vegetative treatment projects would hinder vegetative improvement and subsequent wildlife habitat conditions. Riparian associated wildlife species would benefit.

Fisheries habitat condition would show more improvement than in any of the alternatives. Fisheries water quality, quantity and community richness would improve significantly. Fish populations would also show marked increases.

Wild horse numbers would be allowed to increase to 338 and would be positively affected by improved forage availability and removal of fences. Impacts on cultural resource sites due to livestock grazing would cease. There would be a high enhancement of scenic quality. Recreation quality and activity occasions would increase.

Livestock operators would be adversely affected by complete elimination of livestock grazing. Income losses over twenty years would be significant. The net present worth of rancher income losses would be -$15.7 million. The net present worth of regional, state and federal income losses would be -$23.2 million. Approximately 43 of the 83 operators would have difficulty remaining in business.

Alternative #2 - No Action

The current livestock grazing program would continue. The active grazing preference would remain 113,122 AUMs. This alternative assumes that average annual licensed use would remain 105,009 AUMs. Wild horses would be managed at levels described in the proposed action. There are no specific forage allocations to wild horses and wildlife. No additional project development or land treatment projects to benefit livestock grazing would occur.

Alternative #2 - Environmental Consequences

This alternative would continue present resource conditions and trends. The overall vegetative condition class would be slightly worse, with most of the area being in poor condition. Plants would maintain their low to moderate vigor on areas where trend is static and further decline on areas exhibiting downward trends. The overall productivity of the vegetation would gradually decline from the overuse of the forage. Soil erosion rates are currently exhibiting upward trends and would continue. In twenty years, annual erosion rates would be four percent less than present.

Riparian and stream habitat conditions would remain poor. Associated wildlife species and fish populations would be adversely impacted by livestock grazing. Water quality would remain in poor or fair condition.

The condition of mule deer, antelope and sage grouse habitat would be variable, with some improving and some declining. Deer and antelope populations would increase slightly provided favorable climatic conditions exist. Bighorn sheep habitat is in good condition and would not change.

Wild horses and livestock forage competition would continue. Allotment pasture fences would restrict wild horse movements. Ongoing use would continue to impact 63 known cultural resource sites. Visual resource quality would decline slightly. Recreation quality would decline. However, recreation use for those activities being significantly affected by the proposal or alternatives would increase from 273,000 activity occasions to 441,000 activity occasions as a result of continuing recreation trends.

Livestock operators would be allowed to continue their present operations. There would be no income losses.

Alternative #3 - Maximize Wildlife and Watershed Conditions

Grazing management systems identified in the proposed action would be implemented with stocking rates based on biological limit utilization levels (approximately 30-50 percent). On 45 allotments, turn out dates would be approximately two weeks to one month later than described in the proposed action. Livestock grazing would not be allowed on critical deer winter ranges after September 1. To protect riparian habitat, 113 miles of stream would be fenced, and log structures placed on 36 miles of streambanks. No vegetative treatment projects would be implemented.

Wildlife would be managed at levels described in the proposed action. Wild horses would be allowed to increase to 338. Initial livestock use would be reduced from 113,122 AUMs to 56,507 AUMs.

Alternative #3 - Environmental Consequences

This alternative would significantly improve vegetative conditions. Ecological conditions are expected to improve on all allotments. In twenty years, most of the range would be in fair or good condition. Soil erosion rates would decline by seventeen percent from improved vegetative conditions and increased ground cover. Watershed conditions would show significant improvement.

This alternative also provides significant benefits to wildlife. Later turn out dates, improved range conditions, lower utilization levels and elimination of livestock conflicts on deer winter ranges would improve wildlife habitat conditions. Aquatic wildlife would benefit from fencing 113 miles of stream. This would significantly improve fisheries habitat condition and increase fish populations.

Wild horses would benefit from reduced livestock competition and improved range condition. Impacts from fencing on wild horse ranges would be the same as described for the proposed action. Impacts to cultural resource sites would slightly decrease. Visual quality would be moderately enhanced; recreation quality and use would increase.

Most livestock operators would be faced with initial reductions in use. Over a twenty-year period, some operators would regain this use. The average grazing preference in twenty years (104,219 AUMs) would be eight percent below the current active preference. The net present worth of rancher income losses would be -$6.2 million. The net present worth of regional, state and national income losses would be -$8.9 million.

Approximately 25 of the 83 operators would have difficulty remaining in business.

Alternative #4 - Sixty Percent Utilization Level

This alternative would implement grazing management systems as described in the proposed action, except stocking rates on intensive management allotments would be based on 60 percent utilization levels in place of 50 percent utilization levels. Initial livestock use (93,421 AUMs) would be seventeen percent below current active preference. Protective fencing of streams and riparian habitat would not occur. However, log structures would be placed along 149 stream miles to protect streambanks. Project development and land treatments would be developed as described in the proposed action. Management on less intensive allotments and allotments managed with private lands would remain as described in the proposed action.

Alternative #4 - Environmental Consequences

Implementation of grazing systems with stocking rates based on 60 percent utilization levels would create a more gradual improvement in plant vigor and range condition than described in the proposed action. Riparian zone vegetation would show little improvement, with most areas expected to be in poor or fair condition in twenty years. Erosion rates would decrease by seven percent from increased vegetative cover. Watershed conditions would improve.

Wildlife habitat conditions would improve, correspondent to vegetative condition improvement. Fisheries habitat would improve slightly and aquatic wildlife populations would increase.

Increasing livestock use in allotments containing wild horses would increase the competition for forage.

There would be a slight degradation in scenic quality. Recreation quality and use would increase.

Implementation of grazing systems at 60 percent use levels would decrease the level of livestock reductions. Adverse social and economic impacts would also decrease over levels described for the proposed action. The net present worth of rancher income losses would be -$1.3 million. The net present worth of regional, state and national income losses would be -$4.0 million. Approximately fourteen of the 83 operators would have difficulty remaining in business.

Alternative #5 - Maximum Livestock Use

Grazing management systems would be implemented without changing existing AUM levels (113,122 AUMs) or seasons-of-use. Water development and pasture fencing would remain as described in the proposed action. Protective stream fencing would not occur. Maximum acreages of land treatment are proposed (brush control, 154,000 acres; brush control and seeding, 198,000 acres; Map 2-5). These range treatment projects would be designed to maximize livestock forage production and would not contain multiple use design features. Wild horses would be managed at levels described in the proposed action (118-178). No specific forage allocation is made to wildlife.

Alternative #5 - Environmental Consequences

Implementation of grazing systems at current active preference levels would create variable responses. On allotments where current carrying capacities are less than active preference, impacts would be adverse. Beneficial impacts would result on allotments where current carrying capacities exceed active preference. The overall vegetative condition class would change little from existing levels on native range. Vegetative treatments which would create stabilized condition and trend, are designed for ranges in poor or fair condition. Livestock forage production would increase significantly from the large areas proposed for land treatment. The condition of riparian areas would continue to decline.

Overall, soil erosion rates would decrease by approximately six percent. There would be an increased potential for erosion on land treatment areas above that described in the proposed action because treatments would occur on steeper slopes.

Overall, water quality and fisheries habitat condition would decline. Fish populations would decrease slightly. Other wildlife habitat conditions would decline from implementing large acreages of land treatment without provisions for wildlife habitat protection. Visual resources would be adversely affected by the large acreages of land treated. Recreation quality and hunting and fishing activity use would decline.

Economically, this alternative would be the most beneficial to livestock operators. There would be an increase in rancher net income. The net present worth of these income increases would be $+1.0 million. The net present worth of regional, state and national income losses would be -$1.9 million.

Alternative 6 - Summary Description

This alternative emphasizes the development of voluntary cooperative range management programs following completion of the EIS and Management Framework Plan decision, and prior to implementation of formal allotment management plans. The primary objective of this alternative would be to improve range conditions quicker than as described in the proposed action. This would be done by immediately initiating sound management principles rather than according to the implementation schedule described in the proposed action.

Forage would be allocated to livestock, wildlife and wild horses as described in the proposed action. Livestock adjustments would be scheduled over a five-year period following completion of the EIS. Grazing systems and seasons-of-use would be as described in the proposed action. Project development would be as described in the proposed action except mechanical land treatment would be allowed in Visual Resource Management Class I and II areas and in wilderness study areas if such treatment would be required to meet management objectives. Sagebrush spraying would be allowed on mule deer summer range and within one-fourth mile of riparian areas provided no significant adverse impacts would occur.

Livestock operators would contribute money and manpower for project development and monitoring studies.

Alternative 6 - Environmental Consequences

Vegetative vigor would improve up to two years earlier than anticipated for the proposed action. Ecological condition, however, would not be significantly different than described in the proposed action because of the slow rate of vigor recovery and condition improvement anticipated in the study area. Impacts on soils, water resources, wild horses, wilderness and recreation would not be significantly different than described in the proposed action. Spraying would have the potential to adversely affect mule deer, antelope and sage grouse. Aquatic wildlife response would also be similar to that described for the proposed action. A five-year time lag in stream improvement may result on the portion of stream miles that would not be fenced immediately but would be monitored prior to exclusion of grazing. The condition of fishery habitat in twenty years would not be significantly different than as described in the proposed action.

Scenic quality would be enhanced on most areas. Mechanically treating and seeding VRM Class I and II areas would impair the scenic quality and reduce the VRM rating by one class in the Class II areas.

Livestock use would be similar to that described in the proposed action except that AUM increases would occur earlier, from the accelerated development of land treatment projects.

Income losses over the twenty-year period would be similar to those in the proposed action.

The net present worth of rancher income losses would be $-3.3 million. Rancher contributions toward project development would reduce implementation costs by $840,000. This would, however, reduce benefits to the local construction industry. The total net present worth of regional, state and national income losses would be $-6.0 million. Approximately 21 of the 83 operators would have difficulty remaining in business.

As compared to the proposed action, there may be a strengthening of rancher's feelings of social well-being due to voluntary participation in management actions.

Alternative 7 - Summary Description

This alternative emphasizes wildlife habitat improvement, particularly the forage component of mule deer winter range. Forage would be allocated as in Alternative 3 except in allotments utilized by wild horses. In these allotments, forage would be allocated to support 118-178 horses as described in the proposed action. The forage allocation would be based on plant biological limits (30-50 percent utilization levels) and would be as follows:

Livestock	58,609	AUMs
Wildlife	2,152	AUMs
Wild horses	2,329	AUMs
TOTAL	63,090	AUMs

Grazing systems would be the same as in Alternative 3 except on critical mule deer winter range. On critical mule deer winter range, rotation systems specifically designed to improve bitterbrush growth would be implemented. Season-of-use dates would be as described in Alternative 3 except on allotments 504, 582, 610 and 623. These allotments support high concentrations of deer during the winter. Grazing on these allotments would only be allowed from June 1 to September 1.

Livestock would be excluded on 113 miles of riparian habitat to improve sage grouse brood rearing habitat and that of aquatic wildlife. There would be no reservoirs developed in the bighorn sheep areas of allotment 551.

Project development would be at a lower level than in the proposed action due to an assumed lower amount of funding. Project development would consist of 68 springs, 67 reservoirs, 5 miles of pipeline, 128 miles of pasture fence, 113 miles of stream fencing, 18,000 acres of brush control and 17,000 acres of brush control and seeding. Project design specifications and standard operating procedures would be followed according to the proposed action.

Monitoring programs would be implemented as described in the proposed action. Specific bitterbrush utilization studies would be set up and monitored on critical mule deer winter range to insure livestock use does not exceed 30 percent of the current year's production. Adjustments in livestock use would be made within a three-year period following completion of the EIS.

Alternative 7 - Environmental Consequences

This alternative would improve the existing ecological condition on upland and meadow/riparian bottomland. Vegetative condition by allotment would be as described for Alternative 3, except in allotments which would receive land treatments. On these allotments, a large percentage of the poor condition range would be treated. The effective ground cover on treated areas would improve from the present 55-70 percent to 60-80 percent.

Soil fertility and productivity would increase over the long-term. Improved canopy cover would increase infiltration rates and decrease runoff and erosion potential. In twenty years, the overall annual erosion rates would be seventeen percent less than present.

This alternative would provide the most substantial improvement to all wildlife habitat. More forage and cover would become available as a result of biological limit utilization levels and 30 percent utilization of bitterbrush on critical deer winter ranges. Where implemented, vegetation treatments would improve habitat that currently has almost no wildlife value. This alternative would meet management objectives for wildlife habitat conditions and population numbers. Impacts to aquatic wildlife would be similar to Alternative 3. Wild horses would be impacted as in the proposed action. However, three miles of pasture fence in allotment 508 would not be built, therefore giving them more freedom of movement than in the proposed action.

Scenic quality would be positively affected by this alternative. Recreation use, particularly hunting, would increase due to the growth of wildlife populations in the EIS area.

There would be a significant adverse impact on livestock use. Initial livestock allocation would be reduced from 113,122 AUMs to 58,609 AUMs. In twenty years, vegetative treatment and improved range conditions would increase the AUM level to 112,547 AUMs.

The net present worth of rancher income losses would be $-5.9 million. The net present worth of regional, state and federal income losses would be $-7.4 million. At least 25 livestock operators would have difficulty remaining in business.

A comparison of impacts among alternatives is shown on Table 1.

Table 1
Comparative Impact Summary
(Projected 20-Year Impacts)

Resource	Present Situation	Proposed Action	Alternative #1 No Livestock Grazing	Alternative #2 No Action	Alternative #3 Maximize Wildlife & Watershed	Alternative #4 60% Use Levels	Alternative #5 Maximize Livestock Us
Vegetation:							
Condition Class (% of area)							
Poor	57%	26%	57%	64%	25%	33%	36%
Fair	35%	27%	31%	24%	36%	24%	15%
Good	5%	20%	8%	9%	31%	16%	11%
Excellent	Trace	2%	2%	1%	6%	1%	2%
Treated	3%	25%	2%	2%	2%	26%	36%
Soils:							
Annual Erosion Rates	1.12 tons/acre/year	9% decrease	18% decrease	4% decrease	17% decrease	7% decrease	6% decrease
Water Resources:							
Watershed Condition	fair-poor	slight improvement	slight to moderate improvement	No Change	high improvement	slight improvement	No Change
Water Use by livestock & wildlife	125 acre-feet annually	156 acre-feet annually	7.5 acre-feet annually	125 acre-feet annually	125 acre-feet annually	168 acre-feet annually	168 acre-feet annually
Ecological Condition of Wildlife Habitat							
Mule Deer							
Summer Range	(413,400 acres)						
Poor	57%	23%	54%	61%	22%	30%	69%
Fair	38%	55%	36%	29%	41%	53%	18%
Good	5%	22%	10%	10%	37%	17%	13%
Winter Range	(394,000 acres)						
Poor	56%	22%	53%	60%	21%	29%	68%
Fair	37%	54%	35%	28%	40%	52%	17%
Good	7%	24%	12%	12%	39%	19%	15%
Antelope	(427,500 acres)						
Poor	58%	27%	55%	62%	23%	31%	70%
Fair	37%	29%	33%	26%	38%	26%	17%
Good	5%	44%	12%	12%	39%	43%	13%
Bighorn Sheep	(7,800 acres)						
Poor	5%	5%	4%	5%	5%	11%	18%
Fair	26%	20%	6%	26%	14%	20%	21%
Good	69%	75%	90%	69%	81%	69%	61%
Sage Grouse (nesting)	(187,600 acres)						
Poor	59%	25%	56%	64%	24%	32%	71%
Fair	37%	54%	35%	27%	40%	52%	17%
Good	4%	21%	9%	9%	36%	16%	12%
Meadow/Riparian Assoc Wildlife	(9,700 acres)						
Poor	5%	5%	3%	14%	3%	6%	21%
Fair	90%	83%	42%	79%	79%	87%	72%
Good	5%	12%	55%	7%	18%	7%	7%
Aquatic Wildlife:							
Fisheries Habitat Condition (% of 421 stream miles)							
Poor	51%	5%	3%	56%	3%	11%	65%
Fair	36%	55%	24%	31%	38%	76%	23%
Good	13%	40%	73%	13%	59%	13%	12%
Fisheries Water Quality and Quantity	(% of 42 streams)						
Poor	57%	14%	7%	57%	11%	53%	60%
Fair	43%	71%	72%	43%	71%	47%	40%
Good	0%	14%	21%	0%	18%	0%	0%
Aquatic Community Richness (% of 42 streams)							
Poor	38%	9%	7%	38%	7%	35%	41%
Fair	45%	62%	57%	45%	60%	47%	47%
Good	17%	29%	36%	17%	33%	18%	15%
Trout Numbers	76,000	224,000	275,000	70,000	251,000	145,000	60,000
Trout Pounds	4,000	22,000	28,000	3,500	25,000	12,000	3,000
Wild Horses:							
Management Numbers	324	118-178	338	118-178	338	118-178	118-178

Table 1 (cont.)

Resource	Present Situation	Proposed Action	Alternative #1 No Livestock Grazing	Alternative #2 No Action	Alternative #3 Maximize Wildlife & Watershed	Alternative #4 60% Use Levels	Alternative #5 Maximize Livestock Use
Cultural Resources:	CR sites in good condition, however, 12.5 percent of known CR sites are deteriorating from livestcok trampling & erosion.	The P.A. would adversely impact CR sites slightly due to increased concentrations of livestock in previously ungrazed areas. Some CR site deterioration due to erosion would cease as a result of land treatments.	Adverse impact would cease; sites presently impacted would stabilize in good condition	Adverse impacts would continue on 63 known CR sites, presently unimpacted sites would be adversely impacted.	Adverse impacts would decrease slightly.	Adverse impacts would increase slightly over those presently occurring from livestock concentrations.	Adverse impacts would increase moderately from increased livestock concentrations.
Visual Resource:	Scenic quality from dull to spectacular	Moderate enhancement of visual quality.	High enhancement of scenic quality.	Low degradation of scenic qualities.	Moderate to high enhancement of scenic quality.	Low to moderate degradation of scenic quality.	Moderate-high degradation of scenic quality.
Recreation:							
Off-Road Vehicle Quality	Stable	Slight decrease	Increase	No Change	Slight decrease	Slight decrease	Slight decline
Activity Occasions	175,000	300,000	300,000	300,000	300,000	300,000	300,000
Hunting Quality	Declining	Increase	Increase	Decline	Increase	Slight increase	Decline
Activity Occasions	97,585	160,000	150,000	140,000	175,000	150,000	130,000
Fishing Quality	Declining	Increase	Increase	Slight decline	Increase	Slight increase	Decline
Activity Occasions	724	1,500	2,000	1,100	1,700	1,300	1,000
Livestock Grazing:							
Initial AUM Allocation	113,122	78,336	0	113,122	56,507	93,921	113,122
Projected 20 Year AUM Allocation		142,276	0	113,122	104,214	153,402	146,361
Economics:							
Income Changes (Net Present Worth)							
Rancher	0	-$3.3 million	-$15.7 million	0	-$6.2 million	-$1.3 million	+$1.0 million
Regional-(includes rancher income)	0	-$3.2 million	-$20.8 million	0	-$6.5 million	-$1.0 million	+$1.6 million
National-(Includes range improvement costs)	0	-$2.8 million	-$0.2 million	0	-$1.6 million	-$2.6 million	-$3.7 million
Total (Includes Regional, State & National Income Changes)	0	-$6.5 million	-$23.2 million	0	-$8.9 million	-$4.0 million	-$1.9 million
Employment Changes							
years 1-10	0	-36 jobs	-174	0	-77	-12	+15
years 11-15	0	-22 jobs	-174	0	-18	- 4	+13
years 16-20	0	+ 6 jobs	-174	0	+12	+ 3	+10
Ranch Consolidations Number of operators	0	21	43	0	25	14	0
Social Conditions							
Values and Attitudes	Livestock operators in the study area perceive a good quality of life based on continuation of their ranching lifestyle. Recreation interests are mostly satisfied with opportunities within the study area. However, more hunting & fishing opportunities are desired.	21 operators may be forced to sell or consolidate which would threaten continuation of their ranching lifestyle. 18 ranchers would be pleased with increased allocation. Recreation users would be pleased with increased opportunities.	43 operators may be forced to consider consolidation or sales of their operation which would threaten continuation of their lifestyle. Recreation users would be pleased with increased opportunities.	Ranchers would be pleased that no change would be dictated by the government. Recreation users feelings would be the same as the present situation.	25 operators may be forced to sell or consolidate which would threaten continuation of their ranching lifestyle. Recreation users would be pleased with increased opportunities.	14 ranchers may be forced to sell or consolidate which would threaten continuation of their ranching lifestyle. 34 operators would be pleased with increased allocations. Recreation users would be pleased with increased opportunities.	Ranchers would be pleased that no changes in their lifestyle would be dictated by the government. Recreation users would be disappointed that there would be a reduction in recreation opportunities.

Table 1 (cont.)

Resource	Alternative #6	Alternative #7
Vegetation:		
Condition Class (% of area)		
Poor	26%	23%
Fair	27%	35%
Good	20%	31%
Excellent	2%	6%
Treated	25%	5%
Soils:		
Annual Erosion Rates	9% decrease	17% decrease
Water Resources:		
Watershed Condition	Slight improvement	High improvement
Water Use by livestock & wildlife	156 acre-feet annually	114 acre-feet annually
Ecological Condition of Wildlife Habitat		
Mule Deer		
Summer Range	(413,400 acres)	
Poor	23%	19%
Fair	55%	41%
Good	22%	40%
Winter Range	(394,000 acres)	
Poor	22%	20%
Fair	54%	40%
Good	24%	40%
Antelope	(427,500 acres)	
Poor	27%	23%
Fair	29%	38%
Good	44%	39%
Bighorn Sheep	(7,800 acres)	
Poor	5%	5%
Fair	20%	14%
Good	75%	81%
Sage Grouse (nesting)	(187,600 acres)	
Poor	25%	24%
Fair	54%	40%
Good	21%	36%
Meadow/Riparian Assoc. Wildlife	(9,700 acres)	
Poor	5%	3%
Fair	83%	79%
Good	12%	18%
Aquatic Wildlife:		
Fisheries Habitat Condition (% of 421 stream miles)		
Poor	5%	3%
Fair	55%	38%
Good	40%	59%
Fisheries Water Quality and Quantity (% of 42 streams)		
Poor	14%	11%
Fair	71%	71%
Good	14%	18%
Aquatic Community Richness (% of 42 streams)		
Poor	9%	7%
Fair	62%	60%
Good	29%	33%
Trout Numbers	224,000	251,000
Trout Pounds	22,000	25,000
Wild Horses:		
Management Numbers	118-178	118-178

Table 1 (cont.)

Resource	Alternative #6	Alternative #7
Cultural Resources:	Alt. 6 would adversely impact CR sites slightly due to increased concentrations of livestock in previously ungrazed areas. Some CR site deterioration due to erosion would cease as a result of land treatments.	Slight beneficial impacts may occur to cultural resource sites presently suffering from erosion due to the implementation of vegetative improvement treatments.
Visual Resource:	VRM classes I & II would be adversely impacted; moderate enhancement of scenic quality would occur on classes III & IV.	Moderate to high enhancement of scenic quality.
Recreation:		
Off-Road Vehicle Quality	Slight decrease	Slight decrease
Activity Occasions	300,000	300,000
Hunting Quality	Increase	Increase
Activity Occasions	160,000	195,000
Fishing Quality	Increase	Increase
Activity Occasions	1,500	1,700
Livestock Grazing:		
Initial AUM Allocation	78,336	58,609
Projected 20-Year AUM Allocation	142,276	112,547
Economics:		
Income Changes (Net Present Worth) Rancher	-$3.3 million	-$5.9 million
Regional-(Includes rancher income)	-$3.3 million	-$5.2 million
National-(Includes range improvement costs)	-$2.2 million	-$1.4 million
Total (Includes Regional, State & National Income Changes)	-$6.0 million	-$7.4 million
Employment Changes		
years 1-10	-36 jobs	-66
years 11-15	-22 jobs	- 2
years 16-20	+6 jobs	+34
Ranch Consolidations Number of operators	21	25
Social Conditions: Values and Attitudes	21 operators may be forced to sell or consolidate which would threaten continuation of their lifestyle. 18 ranchers would receive increased allocations. There may be a strengthening of rancher's feelings of social well-being based on voluntary participation rather than mandated adjustments. Recreation users would be pleased with increased opportunities.	25 operators may be forced to sell or consolidate which would threaten continuation of their ranching lifestyle. Recreation users would be pleased with increased opportunities.

CONSULTATION AND COORDINATION IN PREPARATION OF THE FINAL EIS

A 60 day public comment period (April 10 through June 10, 1980) was provided on the Draft EIS to allow public review and comment. Over 400 copies of the Draft EIS were mailed to individuals, federal, state and local government agencies and to non-government organizations.

The Draft EIS was distributed to those agencies, organizations and individuals listed in the Consultation and Coordination section of the Draft EIS (page 5-1). The following list identifies additional distribution of the Draft EIS:

U.S. Department of Commerce
U.P.I. Wire Service
Ada County Commissioners
Ada County Soil Conservation, Meridian
Idaho Statesman
Boise National Forest
Doug Hyslop
Ken Robison
Owyhee Chronicle
J. Tom Meader
Runft & Longeteig
Dr. Ronald Weedon, Chadron State College
Martha Taylor
John Whitsett
Gloria Otto
David Barney
Rodney Hawes
University of Idaho, Biological Science Department
Jere Lee Gilles
Wayne Pickerill

Notice of its availability was published in the Federal Register on April 15, 1980. In addition to the Federal Register notice, a national press release was issued from the BLM Washington Office. The BLM Boise District Office sent out a media release to approximately 85 statewide and regional television and radio stations and newspapers. The Federal Register and media releases also gave the dates and places for the following listed public hearings that were held:

May 28, 1980 - Red Lion Inn, Boise, Idaho

May 29, 1980 - Marsing Grade School, Marsing, Idaho

During the review period, 30 letters were received from federal, state and local agencies, private organizations and interested citizens. Fifteen individuals gave oral testimony at the public hearings. A hearings officer presided over the hearings and testimony was recorded verbatim by a court reporter. The BLM Boise Assistant District Manager, Owyhee Resource Area Manager and the Environmental Impact Statement Team Leader comprised the BLM panel at the hearings. A copy of the public hearing transcripts is on file at the BLM Boise District Office.

All letters and public hearing comments were reviewed and considered in the preparation of the Final EIS. Table 2 (page 58, Comment & Response Section) lists the letters that were received and the individuals who gave oral testimony at the public hearings.

Although all public input will be considered when management decisions for the Owyhee area are made, only comments that presented new data, questioned facts or the adequacy of the impact analyses and raised questions or issues bearing directly upon the Draft EIS were responded to in this Final EIS. The text change section indicates how the Draft EIS was changed to respond to these comments where necessary.

Development of Alternative 6

Following distribution of the Draft EIS, the BLM was contacted by Owyhee area cattlemen to discuss means by which they could provide input into the Final EIS and management decision. A meeting was held on May 6 with the Owyhee Cattlemen's Action Committee, consisting of approximately ten Owyhee cattlemen representing the Owyhee County Cattlemen's Association; and Dave Tidwell, Rangeland Resource Coordinator, University of Idaho. At this meeting it was felt the best way to incorporate their suggested changes and concerns into the EIS would be to develop an additional alternative.

Subsequent meetings were held with Dave Tidwell on May 9 and May 21 to discuss specific actions that would be included in the alternative. Using input from these meetings, the Action Committee with assistance from Mr. Tidwell, prepared a description of Alternative 6 which was presented to and accepted by the Owyhee County Cattlemen's Association. This alternative was presented as testimony by Mike Hanley (Co-chairman of the Action Committee), at the public hearing in Marsing on May 29.

Following the public hearings, it became apparent that several ranchers within the EIS area did not wholly support the alternative as presented. Consequently, the ranchers held a meeting on June 9 to discuss the points with which they disagreed. The majority of the area ranchers, as well as the BLM, were present at the meeting. Since all points of contention were not resolved at this meeting, a subsequent meeting was held with Dave Tidwell and the Action Committee on June 16 to finalize the alternative.

The primary role of the BLM during these meetings was to provide assistance to the cattlemen regarding the wording, format, level of detail and type of actions which could be considered in an additional alternative. The specific content of the alternative was provided by the cattlemen.

Following these meetings, the revised alternative was submitted to the BLM to be considered along with other alternatives in the Final EIS. The revised alternative is included, as submitted, in the Comment and Response section (page 91).

Since the alternative incorporated an impact assessment by the cattlemen, it was reworded to be consistent with other alternatives prior to EIS team evaluation. Also, the alternative as submitted, was not specific on several management proposals. It was necessary to specify various elements so a meaningful analysis could be provided. The description of Alternative 6 as it was reworded for EIS team evaluation, was reviewed by Dave Tidwell on July 3, whereby, he indicated that it was satisfactorily written.

Impact assessment provided by the Owyhee cattlemen was considered by the EIS team when doing their assessment.

Development of Alternative 7

Alternative 7 was developed primarily as a result of written comments received on the Draft EIS by the Idaho Wildlife Federation, the Third District Idaho Wildlife Federation and the Idaho Department of Fish and Game. These letters of comment suggested analysis of a reasonable alternative to the proposed action that contained a mix of resource allocations not analyzed in the proposed action or other alternatives. A meeting was held with Bill Meiners and Russ Heughins on June 13 to discuss the specific types of actions they felt should be analyzed in an additional alternative.

Using input from this meeting with their comment letters, BLM wildlife biologists, range specialists, the Owyhee Area Manager and the EIS Team Leader prepared the description of Alternative 7. This alternative was reviewed with Bill Meiners on July 8. He indicated that it adequately addressed those points he felt should be considered in an additional alternative.

ALTERNATIVE 6

Introduction

This alternative emphasizes the development of voluntary cooperative range management programs following completion of the EIS and Management Framework Plan decision and prior to the implementation of formal allotment management plans. By working closely with range users and other interests involved, it is anticipated that BLM could implement grazing management on a portion of the EIS area earlier than the five-year period assumed for project development and grazing system implementation described in the proposed action. It is also anticipated that the land treatment projects could be implemented earlier than the fifteen-year period described in the proposed action through contributions of money and manpower from range users.

Objectives

The objectives of Alternative 6 would be identical to those of the proposed action. In addition, the following policies, goals, and objectives are explicitly stated:

1. To achieve a productive ecological range condition two to eight years earlier than in the proposed action by voluntarily initiating sound management principles immediately rather than according to the implementation schedule described in the proposed action.

2. To promote cooperative resource management which recognizes the needs of all interests.

3. To promote coordinated voluntary range and allotment planning on all intermingled and associated land ownerships with the cooperation of private landowners, Idaho Department of Lands, Idaho Fish and Game Department, USDA Soil Conservation Service, and others as appropriate.

4. Provide for a program of continuous range improvement through the identification of long-range operations and maintenance responsibilities. These would allow projects to be planned, carried out, and maintained in a systematic manner and establish target levels of vegetative condition and capability.

5. Recognize the need for maintaining a strong local food and fiber producing industry and thriving recreational opportunities for local citizens and visitors.

6. Recognize the importance of maintaining the present ranching society in Owyhee County and its associated low human population density upon which the future of desirable wildlife and recreational opportunities depend.

Forage Allocation

Vegetation would be allocated to livestock and wild horses, deer, antelope and bighorn sheep, as in the proposed action. Wild horses would be managed within a range of 118 to 178. According to the 1977 vegetation inventory, there is an apparent forage deficiency of approximately 34,786 AUMs below the total active grazing preference (31 percent), and 26,673 AUMs below the 1975-79 average use (24 percent). The forage use is summarized below:

Alternative 6 - Proposed Use[1]

	Proposed Use	Existing Use
Livestock	78,336	105,009[2]
Wildlife	2,152	1,135
Wild horses	2,329	4,225
TOTAL	82,817	110,369

[1] Competitive livestock AUMs

[2] Five-year average active licensed use

The vegetation allocation for intensive management areas is based on 50-60 percent utilization levels of palatable plants. On allotments not intensively managed, the forage allocation is based on biological limits (30-50 percent utilization levels). On intensive management areas, the 50 percent utilization level would be applied until specific AMP objectives have been achieved (including the twenty-year objectives for ecological condition). At that time, utilization levels up to 60 percent would be considered if consistent with AMP and MFP goals. Utilization levels which exceed 50 to 60 percent would be allowed to achieve specific objectives. Examples would be to allow 70-80 percent utilization to remove wolf plants on crested wheatgrass seedings or to graze bitterbrush heavier than 50 percent to achieve a desired form class. Periodic heavy grazing of cheatgrass might also be desired to achieve management objectives.

Adjustments in livestock use, if necessary, would be scheduled over a five-year period on allotments in which cooperative management plans are developed. On allotments where cooperative management agreements are not developed, adjustments would be implemented within a three-year period as described in the proposed action. Features of the cooperative interim management plans are described in the following section on livestock grazing management.

There would be 1 to 1 1/2 years of consultation between BLM and the permittee prior to implementation of a management decision. Following the mutually agreed upon decision, there would be an annual review. The term of the initial decision would be two to three years, at which time it would be reviewed for effectiveness, renegotiated and renewed. Following the first five years, subsequent plans would follow a mutually agreed upon term. Studies of range condition and trend would be conducted and reviewed annually by the permittee, BLM and other involved agencies and persons. Livestock adjustment would not occur on ranges which do not exhibit a downward trend if utilization levels are within the desired utilization levels, and the range is responding to management.

1. Needed adjustments would be made utilizing changes in numbers or time, as mutually agreed to by the permittees and BLM. Imbalances in grazing capacities between fields would also be corrected wherever possible through season-of-use adjustments.

2. Livestock operators would be allowed to utilize voluntary non-use rather than having their grazing preference reduced.

3. The permittee and BLM would agree to a program of range improvements. These would provide private and federal participation to insure restoration of livestock use at or above original levels in the shortest possible time.

4. Livestock use would be monitored annually by operators and BLM. When the range is improving or stabilized, and utilization of key species is at the agreed upon levels, no further reductions would be required.

Additional forage production would be allocated as described in the proposed action.

Livestock Grazing Management

The three levels of management intensity, grazing systems and seasons-of-use for individual allotments would be the same as described in the proposed action.

The grazing systems currently identified for allotments in the intensive management category would be developed in close consultation and cooperation with the permittees and other user interests at the AMP stage. On areas not intensively managed, BLM would assist permittees in the development of cooperative, coordinated, voluntary range management programs. Where these programs are initiated and designed to meet BLM allotment objectives, grazing utilization levels up to 50 percent would be allowed. Grazing capacities would be determined accordingly, rather than by biological limits. Once AMP objectives are met, grazing utilization levels up to 60 percent would be considered if consistent with MFP and AMP goals.

Following completion of the EIS and MFP and prior to implementation of formal allotment management plans, the range users would initiate voluntary interim management actions to accelerate range improvement and forage production. These actions could consist of a combination of the following actions:

1. Later turn out dates which coincide with plant growth stages. Practicable turn out dates would be developed to encourage the most rapid and practical improvement in range condition.

2. Areas traditionally used in the spring would be deferred on alternate years during the grazing season.

3. Grazing at utilization levels which are less than 50 percent on areas which exhibit low plant vigor.

4. Development of grazing programs by the permittee individually or with assistance from SCS or other state and federal agencies. These would be reviewed by BLM for compliance with management objectives.

Stream and riparian habitat management would be as described in the proposed action. However, complete exclusion of grazing would not be applied unless monitoring studies indicate the management objective of achieving fair fisheries habitat condition in five years and good condition in ten years is not being met. Special riparian management practices would be incorporated into grazing systems where possible on 64 stream miles, and log structures would be placed on 86 stream miles as described in the proposed action.

Implementation and Maintenance of Range Improvements and Land Treatments

The Owyhee cattlemen have requested that stewardship programs be developed. The BLM would consider designing the EIS area as an Experimental Stewardship Area without a chartered steering committee. The ad hoc Owyhee County Cattlemen's Association Action Committee would provide the necessary direction and coordination.

The purpose of the Experimental Stewardship Program in Owyhee County would be to assist the BLM in devising and testing innovative range resource management practices and incentives for encouraging participation and investment in range improvements by ranchers and local interest groups.

Authorized range improvements placed on federal land by permittees would be encouraged. The Federal Land Policy and Management Act, the Public Rangeland Improvement Act and BLM regulation and policy provide the following protection or incentives for private investments in range improvements which would be considered.

1. Should the permittee lose his permit through no fault of his own, he may:

   a. Remove the improvements from federal land.

   b. Be reimbursed up to fair market value by the federal government.

   c. Be reimbursed up to fair market value by the successor-in-interest.

2. If a stewardship program were initiated, the following incentives for range improvements would be considered:

a. The payment of up to 50 percent of the amount due the federal government for grazing fees in the form of a credit for improvement work.

b. Sharing in the benefits of improvements.

c. Official recognition of good management to be placed in the permittee's permanent record.

d. Other innovative incentives deemed appropriate.

Based on implementation of existing management plans and experience with operators within the EIS area, it is estimated that range users would contribute 50 percent of the cost of fences and springs in the form of labor. They would also contribute 50 percent of the labor costs for controlled burning. The BLM would fund the remaining developments as described in the proposed action.

The amount and location of project development and land treatments would be as described in the proposed action. The criteria for development would be the same as described in the proposed action with the following exceptions:

1. Spraying, chaining and seeding with mechanical ground equipment in Class I or II VRM areas or areas under wilderness review would be allowed if such treatment would be required to achieve MFP or AMP objectives. Treatments would be accomplished within the interim management guidelines for wilderness study areas.
2. Sagebrush spraying on deer summer ranges or sage grouse areas would be allowed provided no significant negative impact on game species would occur.
3. Spraying within one-fourth mile of riparian areas would be allowed, if site specific analysis indicated that no significant adverse impacts would occur.
4. Close coordination would be maintained with the Owyhee County Historical Society and the State Historic Preservation Office when planning projects in high cultural resource site density areas.

Monitoring Program

The monitoring program described in the proposed action would be initiated. It would be developed in close cooperation with range users. A portion of the additional manpower required for utilization studies (30 work months) would be contributed by range users following training by BLM personnel. Responsibility for conduct and recording of utilization studies would be described in the AMP.

Implementation Schedule

The implementation of this alternative would occur in the same sequence as the proposed action. Adjustments in grazing use would be over a five-year period where cooperative interim grazing management programs are developed. Where cooperative management programs are not developed, adjustments would be scheduled over a three-year period as described in the proposed action. Water developments, fencing and grazing systems would be implemented within a five-year period following completion of the EIS.

Land treatment practices (brush control and seeding) would be completed and available for use as soon as practicable. Subject to the availability of funds on the part of range users and BLM, and to the ability of livestock operators to withhold livestock from treatable sites, the maximum possible acreage of land treatments would be carried out on sites having the greatest productive potential during the first five-year period. Those practices which would yield smaller resource benefits would be carried out during the subsequent five-year periods.

Through contributions of money and manpower from range users, it is anticipated that land treatments would be completed in less than fifteen years as described in the proposed action.

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE 6

Assumption and Analysis Guidelines

Money and manpower would be available on an accelerated basis to provide archaeological clearance if project development is completed earlier than described in the proposed action.

Grazing use would be held to 50 percent utilization levels. The impact analysis of 60 percent utilization levels under Alternative 4 indicated MFP objectives would not be met within the twenty year time frame if 60 percent use levels were allowed.

A five-year phase-in period for adjustments in livestock use would be initiated on all allotments.

VEGETATION

Although implementation of grazing management prior to development of AMPs would initiate plant vigor restoration up to two years earlier, the improvement of vegetation condition would not be significantly different than described in the proposed action. The rate which the range would improve appears to be quite slow. Mueggler (1975) found that poor vigor Idaho fescue and bluebunch wheatgrass would recover to normal levels of vigor if protected from clipping for six to eight years. Dillion and Wallenmeyer (1966) state low vigored bluebunch wheatgrass needs all its leaves to improve, especially when the stand has been invaded by cheatgrass.

McLean and Tisdale (1972) found 20 to 40 years of complete rest was required for range to recover excellent condition after overgrazing. On poor condition range, ten years rest yielded little change in condition. The change from poor to fair took longer than the change from fair to good.

Therefore, the impacts to vegetation from grazing management, land treatments, and range improvements are not predicted to be significantly different from those outlined in the proposed action (see pages 4-2 to 4-11, Draft EIS).

SOILS

This alternative would decrease soil erosion and compaction and increase soil productivity. Implementation of grazing systems two years earlier than the proposed action would initiate quicker improvement in plant vigor. However, these benefits may be offset by the delay in the adjustment schedule. Generally there would be no significant difference in the short or long-term erosion rates from that described in the proposed action. In twenty years, the annual erosion rate would be reduced from the present 1.12 tons/acre/year to 1.02 tons/acre/year.

WATER RESOURCES

Impacts on watershed condition, water availability and water use would be as described in the proposed action. Overall watershed conditions would be slightly improved due to reduced erosion rates and improved ground cover.

TERRESTRIAL WILDLIFE

Impacts of Alternative 6 on wildlife would be similar to impacts described in the proposed action.

Mule Deer

Mule deer habitat condition and population would improve similar to the proposed action, with some exceptions.

Local deer herds usually summer in the same areas every year. Of the three classes of forage (browse, forbs and grasses), grass is an important source of protein in early spring and late fall. Forb consumption is greatest in late spring and is a prominent part of the summer diet. Spraying for sagebrush in deer summer ranges would reduce the forb and shrub species. The optimum summer diet of mule deer consists of 50 percent forbs, 45 percent shrubs, and 5 percent grass. Spraying summer use areas would remove the essential forb and shrub diet components. This action could be critical to fawn survival rate and overall herd productivity. Therefore, there may be specific sites where no spraying would occur on deer summer ranges.

Antelope

Antelope habitat conditions and population would improve similar to that stated in the proposed action.

Spraying of deer summer ranges which overlap antelope ranges can have adverse impacts to the populations. Antelope summer diet consists of approximately 40 percent forbs, 50 percent shrubs and five percent grass (Kitchen 1974). The removal of the forb-shrub components of the local diet can have an adverse impact on herd productivity. Therefore, there may be specific sites where no sagebrush spraying would occur on antelope ranges.

Bighorn Sheep

Vegetative improvement would slightly benefit the bighorn population. Water development could cause the local overuse of forage important to bighorn sheep as described in the proposed action.

Sage Grouse

Sage grouse habitat and populations would improve similar to that stated in the proposed action.

Spraying of sagebrush in sage grouse nesting and brood rearing areas may cause adverse impacts to population growth. Braun et al. (1977) found that in May, sage grouse shift from a sagebrush dominated diet to a diet dominated by forbs. Klebenow and Gray (1967) stated that 52 percent of sage grouse chick diet was insects during the first week after hatching. After one week, insect volume dropped and forbs became important and continued as a major food source throughout the summer. Spraying for sagebrush on these critical areas would cause an increase in the chick mortality rate and a decrease in population growth. Therefore, there may be specific sites where no spraying would occur on sage grouse areas.

Waterfowl

Waterfowl populations are expected to increase as described in the proposed action.

Riparian Associated Wildlife

Riparian associated habitat would improve as stated in the proposed action. Areas with significant improvement would be the result of fencing programs.

Summary

Alternative 6 would provide the habitat condition to support wildlife populations as stated in the proposed action. Given the mitigating measure that spraying would not occur if adverse impacts would result, management objectives should be met.

AQUATIC WILDLIFE

Impacts to aquatic wildlife would be similar to those described for the proposed action. However, a five-year time lag in meeting the stream objective outlined in the proposed action would result on that percentage of the 64 stream miles which would not be fenced to exclude livestock unless monitoring studies indicated objectives were not being achieved. It is anticipated that approximately 25 of the 64 stream miles would not be fenced to incorporate special riparian management practices, but would be grazed under the grazing system proposed for the entire allotment. As was documented in the discussion of stream improvement under the grazing systems in the proposed action, little improvement in stream condition is anticipated. Therefore, it is anticipated that exclusion of grazing would be required in five years to meet objectives. The projection of fisheries habitat condition in twenty years would not be significantly different from that described in the proposed action because of the rapid rate of improvement anticipated following exclusion of grazing on these stream miles.

WILD HORSES

The impacts of this alternative would be the same as in the proposed action. Wild horses would benefit from improved vegetative condition and water development. Fences would restrict wild horse movement during the livestock grazing season.

CULTURAL RESOURCES

Adverse impacts to prehistoric and historic cultural resource sites would increase slightly over the present situation as described in the proposed action. These impacts would occur from increased concentrations of livestock near spring and reservoir developments and on areas currently ungrazed or lightly grazed. Beneficial impacts in the form of increased vegetative cover would decrease the effects of erosion on cultural resources. Slight beneficial effects to those cultural resource sites presently being impacted by erosion could occur due to the accelerated implementation of land treatment projects.

WILDERNESS

The relative impact and residual effects of this alternative on the wilderness resource, assuming full implementation, would be the same as that described under the proposed action.

Lands under wilderness review would be managed under the Interim Management Policy (page 2-14, Standard Operating Procedures, Draft EIS) so their suitability for preservation as wilderness would not be impaired. Specific impacts of each proposed activity would be assessed in site-specific analysis. To assure compliance with the "nonimpairment" standard of the Interim Management Policy, full responsibility for the development, maintenance and operation of approved range improvements on all lands under wilderness review would remain with BLM. The Interim Management Policy recognizes the need to meet the objectives of Allotment Management Plans whenever possible. However, current policy prohibits the use of chemical, mechanical and biological methods of vegetative manipulation and mechanical methods of seeding because these methods cannot comply with the "nonimpairment" standard using normal methods of development.

VISUAL RESOURCE MANAGEMENT

Impacts on visual resources would be similar to those described for the proposed action. Improvement in vegetative condition would enhance scenic quality while project development would introduce new man-made intrusions. Spraying, chaining and seeding with mechanical equipment in Class I and II areas would have the following impacts:

Class I: Approximately ten percent of the acreage within Class I has suitable soils potential for land treatment. If this area were treated, it would degrade the natural appearance of the treated area.

Class II: Approximately 25-30 percent of the acreage within Class II has suitable soils potential for land treatment. If these areas were treated, it would impair the scenic quality and would reduce the VRM class rating from II to III.

Adjacent Class I and II lands in the same viewing area would be degraded by adding unnatural contrast to the scenery. Reducing the visual quality on Class I and II lands would significantly reduce the overall scenic quality for the entire Owyhee area.

Remaining impacts are similar to those analyzed for the proposed action and summarized in Table 4-12 of the Draft EIS.

RECREATION

Impacts would be as described for the proposed action. Improved vegetative conditions would create a long-term beneficial impact on wildlife and fishery resources, improving the quality of hunting and fishing opportunities. Proposed fences and seasonal closures of some popular ORV areas would prove an annoyance to motorcyclists and 4-wheel enthusiasts.

Recreation use levels with implementation of Alternative 6 are summarized below:

Recreation Use [1]

	Existing Situation	Alt. 6 Year 2000	No Action Year 2000 [2]
Off-Road Vehicle	175,000	300,000	300,000
Hunting	97,585	160,000	140,000
Fishing	724	1,500	1,100
TOTAL	273,309	461,500	441,100

[1] Activity occasions
[2] This represents a continuation of current trends

LIVESTOCK GRAZING

Forage production would increase 63,940 AUMs above the initial stocking level of 78,336 AUMs. Through contributions of money and manpower from range users, vegetative treatment, water development and fencing would be completed as quickly as possible. Increases in AUM levels would therefore be quicker than that described in the proposed action.

Maintenance to prevent entrapment of livestock in the 64 miles of fence in riparian zones would be required.

Since the vegetative condition class responses are not predicted to be significantly different from the proposed action, the short and long-term impacts would be the same as described in the livestock grazing section of the proposed action. Table 3 summarizes the AUM allocation for this alternative.

Table 3
Summary of AUM Allocation for Alternative 6

	Total Available	Wildlife	Wild Horses	Livestock	% Change
Initial	82,817	2,152	2,329	78,336	-31*
20-Year Projection	146,757	2,152	2,329	142,276	+26*

* The percent change from active preference.

ECONOMICS

Rancher Income

This alternative would have the same impact on rancher income as the proposed action. This is because the initial forage allocation and the long range forage allocation to livestock is the same as the proposed action. Rancher contributions for range improvements could have some impact. The majority, however, would be donated labor and probably would have little or no adverse impact.

Regional Income

There would be fewer benefits to the local construction industry. The range improvement money that the proposed action anticipated being spent in the region was primarily for labor. Since this is what the ranchers would donate under this alternative, the construction benefits would be reduced. The purchase planned within the EIS area for labor to develop pasture and exclosure fences, springs, and controlled burning would not be necessary. This would total $238,900 with a net present worth of approximately $149,000.

The secondary income losses would be the same as in the proposed action.

This alternative would have the same impact on hunting and fishing expenditures as the proposed action.

The net present worth to the regional economy of implementing this alternative would be -$3.3 million and is comprised of the following:

Direct Rancher Losses	-$3.3 million
Secondary Losses	-$1.3 million
Gains From Range Improvements	+$.28 million
Gains From Recreation Use	+$1.0 million

Employment

This alternative would impact employment the same as the proposed action.

Ranch Consolidation

Ranch consolidations would be the same as in the proposed action.

Capital Position

Capital position would not be impacted as in the proposed action. Since reductions would be in the form of voluntary nonuse instead of suspended nonuse, the capital asset (grazing permit) would remain intact.

Other Impacts

Other impacts would be the same as the proposed action except for the range improvement costs to the federal government. Rancher donations would decrease the costs by $840,000 (49 percent of the total cost of fences, springs, and burnings). The net present worth of this decreased cost would be $575,000. This would make the net present worth of range improvements to the federal government -$2.2 million.

Summary

The total net present worth of this alternative (regional, state, federal) would be -$6.0 million.

SOCIAL CONDITIONS

The social effects of Alternative 6 are similar to those of the proposed action. There may be a strengthening of the rancher's feelings of social well-being as compared to the proposed action based on their voluntary participation rather than mandated adjustments, as well as seeing their input to the BLM decision making process.

ALTERNATIVE 7

Introduction

This alternative addresses aspects of wildlife habitat that did not reach optimum potential or were left with unmitigated adverse impacts in the proposed action and Alternative 3. Of primary concern was (1) the continuation of late season livestock grazing on some allotments in the mule deer winter range, (2) the inability of proposed grazing systems to provide optimum bitterbrush condition for the deer's winter diet, (3) allowing 50 percent utilization levels of bitterbrush by livestock, (4) the limited management guidelines on the lands to be managed with private land, (5) the projected lack of improvement in riparian habitat condition, (6) the proposed development of livestock water near bighorn sheep use areas, (7) the maximization of wild horse populations (8) the absence of vegetative treatment projects on areas that would not improve through grazing management alone and (9) the availability of funds to effectively implement and monitor the selected proposal.

Alternative 7 proposes a course of action directed primarily at improvement of wildlife habitat and emphasizes the forage component of mule deer winter range.

The specific actions designed to enhance wildlife habitat are:

(1) No livestock grazing would be permitted after September 1 on critical mule deer winter range; a time when grasses are cured and cattle start to heavily graze bitterbrush.

(2) Livestock utilization of bitterbrush would be limited to 30 percent on all mule deer winter ranges. Livestock would be removed if utilization studies indicate they are using more than 30 percent of the current year's growth.

(3) All allotments within the critical mule deer winter range would be managed under rotation grazing systems specifically designed to enhance the palatable shrub components. These systems would provide seedling establishment and forage production.

(4) Critical winter range allotments that fall into the management with private lands category would be assigned a season-of-use that does not extend beyond September 1. In addition, utilization limits of 30 percent on bitterbrush would be followed.

(5) Livestock would be excluded on 113 miles of riparian habitat through fencing of streams. Log structures would be placed on an additional 37 stream miles as described in Alternative 3. The aquatic wildlife portion of the management framework plan indicates that these management actions would maximize fisheries habitat improvement. The location of specific treatment areas would be as described in Alternative 3.

(6) No reservoir developments would be made within the bighorn sheep areas of allotment 551. This would eliminate any potential conflict that might occur due to livestock - bighorn interactions.

(7) Wild horse numbers would be maintained at proposed action levels. This would keep wildlife habitats, especially the antelope ranges, from being overutilized by horses.

(8) Vegetative improvement treatments are being recommended for selected allotments currently in poor ecological condition to enhance overall forage and cover values. These allotments are 500, 501, 525, 533, 539, 540 and 541. These areas would not be expected to improve without vegetative treatment to open the dense stands of big sagebrush and juniper which limit good vegetative compositions.

Vegetative Allocation

Initial forage allocation for livestock would be based on plant biological limits as described for Alternative 3, except in allotments that contain wild horse use.

In these allotments, forage and other habitat requirements would be allocated to maintain the wild horse population at 118 to 178 as in the proposed action. The resulting allocations are summarized below and shown by allotment on Table 4.

Alternative 7 - Proposed Use [1]

	Proposed Use	Existing Use
Livestock	58,609	105,009[2]
Wildlife	2,152	1,135
Wild horses	2,329	4,225
TOTAL	63,090	110,369

[1] Competitive livestock AUMs
[2] Five-year average licensed use

Forage would be allocated for mule deer, antelope, and bighorn sheep, as in the proposed action. This alternative recognizes the need for providing additional forage allocations to bighorn sheep if populations expand above present levels.

As existing herds expand, or if necessary to allow expansion, sufficient forage would be allocated to satisfy their needs. Allocation of increased forage would be as described in the proposed action.

Adjustments in livestock use would be made within three years following completion of the EIS, based on the range survey data collected during 1977 and 1978. This would eliminate the dependence upon annual utilization monitoring to determine initial stocking rates.

Table 4
Alternative 7 - Proposed Use and 20-Year AUM Projections

		Competitive AUM Allocation						20-Year AUM Projections				
								Treatments				
Allot.	Proposed Season-of-Use	Total Available	Wild-life	Wild Horses	Live-stock	Active Pref-erence	% Change	BC	B&S	Increase Due to Grazing Manage-ment	Total	% Change from Active Preference
Intensive Management												
450	6/1-10/31	227	10	--	217	360	- 40			191	408	+ 13
500	5/1-6/30	1,506	29	--	1,477	4,478	- 67	---	824	468	2,769	- 38
501	7/1-9/1	590	54	--	536	1,788	- 70	310	679	354	1,879	+ 5
502	6/16-9/30	144	11	--	133	800	- 83			114	247	- 69
503	6/7-9/1	952	83	--	869	3,344	- 74			2,606	3,475	+ 4
505	5/1-9/1	748	22	--	726	446	+ 63			456	1,182	+165
506	6/1-9/1	1,021	26	--	995	3,547	- 72			1,040	2,035	- 43
507	4/16-9/1	116	2	--	114	439	- 74			110	224	- 49
508	5/1-9/1	4,040	91	712	3,237	4,274	- 24			1,692	4,929	+ 15
509	7/28-9/1	164	6	--	158	169	- 7			167	325	+ 92
513	4/30-6/15	174	---	--	174	267	- 35			256	430	+ 61
514	4/16-6/15	688	1	--	687	1,250	- 45			100	787	- 37
515	5/21-9/1	1,319	12	--	1,307	1,276	+ 2			1,152	2,459	+ 93
516	4/21-9/1	1,529	24	339	1,166	1,712	- 32			656	1,822	+ 6
517	5/1-8/20	3,149	89	587	2,473	4,720	- 48			2,410	4,883	+ 3
518	4/16-9/1	631	2	--	629	1,459	- 57			546	1,175	- 19
519	4/16-9/1	752	2	--	750	1,750	- 57			1,006	1,756	0
521	5/16-8/20	1,134	9	429	696	1,694	- 59			378	1,074	- 37
522	4/16-6/15	347	3	143	201	651	- 69			80	281	- 57
525	6/1-9/1	670	7	--	663	886	- 25	---	375	316	1,354	+ 53
526	5/28-6/30	124	87	--	37	274	- 86			113	150	- 45
529	5/11-9/1	238	11	--	227	726	- 69			332	559	- 23
530	4/16-9/1	475	2	--	473	180	+163			20	493	+174
531	5/1-9/1	435	16	--	419	1,699	- 75			458	877	- 48
532	4/16-9/15	1,820	5	--	1,815	2,725	- 33			1,892	3,707	+ 36
533	6/16-9/1	405	6	--	399	1,609	- 75	160	269	195	1,023	- 36
534	6/16-10/31	305	5	--	300	743	- 60			722	1,022	+ 38
535	10/1-2/15	1,967	2	--	1,965	2,262	- 13			1,970	3,935	+ 74
536	6/16-9/1	171	10	--	161	374	- 57			284	445	+ 19
539	4/16-9/1	4,215	277	--	3,938	7,338	- 46	714	646	4,225	9,523	+ 30
540	6/7-9/30	1,730	128	--	1,602	3,726	- 57	724	357	2,175	4,858	+ 30
541	5/16-9/1	2,578	25	--	2,553	4,345	- 41	684	489	1,915	5,641	+ 30
542	6/16-9/1	135	4	--	131	87	+ 51			12	143	+ 64
546	6/7-10/31	560	29	--	531	1,020	- 48			680	1,211	+ 19
548	5/1-10/31	2,574	117	--	2,457	2,935	- 16			642	3,099	+ 6
549	5/1-10/31	210	29	--	181	356	- 49			266	447	+ 26
550	5/1-10/31	353	26	--	327	400	- 18			272	599	+ 50
551	5/28-6/30	781	202	--	579	1,200	- 52			507	1,086	- 10
552	5/22-8/31	88	8	--	80	139	- 42			115	195	+ 40
553	5/22-8/31	68	1	--	67	128	- 48			43	110	- 14
554	5/28-9/1	574	36	--	538	2,412	- 78			748	1,286	- 47
556	5/21-9/1	1,326	25	119	1,182	1,532	- 23			1,135	2,317	+ 51
557	6/1-9/1	61	2	--	59	255	- 77			101	160	- 37
562	6/1-6/30	218	7	--	211	229	- 8			90	301	+ 31
563	6/1-9/30	663	13	--	650	985	- 34			51	701	- 29
565	5/16-9/1	1,918	17	--	1,901	2,410	- 21			502	2,403	0
568	4/16-6/15	118	---	--	118	113	+ 4			135	253	+124
569	5/16-9/1	2,429	96	--	2,333	6,329	- 63			2,993	5,326	- 16
570	7/1-10/31	1,027	29	--	998	1,127	- 11			241	1,239	+ 10
571	11/1-1/31	1,422	2	--	1,420	1,491	- 5			1,983	3,403	+128
572	5/28-9/1	101	4	--	97	212	- 54			61	158	- 25
573	6/16-9/30	569	25	--	544	2,013	- 73			1,254	1,798	- 11
574	6/1-6/15	50	10	--	40	774	- 95			112	152	- 80
578	10/1-1/31	410	---	--	410	839	- 51			971	1,381	+ 65
579	5/16-9/1	1,196	16	--	1,180	1,463	- 19			214	1,394	- 5
580	6/7-9/30	612	33	--	579	2,378	- 76			499	1,078	- 55
581	6/1-9/30	393	54	--	339	925	- 63			654	993	+ 7
585	4/28-10/31	582	---	--	582	1,057	- 45			436	1,018	- 4
587	5/16-10/31	551	30	--	521	2,271	- 77			599	1,120	- 51
588	5/1-9/1	1,336	10	--	1,326	2,710	- 51			690	2,016	- 26
589	7/1-10/31	713	11	--	702	2,103	- 67			226	928	- 56
590	8/7-10/31	188	1	--	187	664	- 72			122	309	- 53
593	7/28-9/1	164	14	--	150	90	+ 67			276	426	+373
595	7/1-9/1	436	21	--	415	600	- 31			79	494	- 18
597	5/28-9/1	271	3	--	268	200	+ 34			5	273	+ 37
599	5/1-10/31	499	60	--	439	1,754	- 75			273	712	- 59
600	7/21-9/1	256	11	--	245	143	+ 71			157	402	+181
601	6/7-10/31	187	18	--	169	1,208	- 86			283	452	- 63
602	6/7-10/31	173	12	--	161	695	- 77			304	465	- 33
603	5/1-6/30	613	3	--	610	853	- 28			606	1,216	+ 43
Sub-total		58,189	2,036	2,329	53,824	107,411	- 50	2,592	3,639	46,736	106,791	- 1
Less Intensive Management												
510	6/16-9/1	5	1	--	4	56	- 93			4	8	- 86
520	6/14-10/31	1,197	7	--	1,190	1,407	- 15			155	1,345	- 4
544	6/7-9/1	99	1	--	98	279	- 65			55	153	- 45
558	6/16-10/31	40	2	--	38	120	- 68			52	90	- 25
559	8/15-9/1	7	1	--	6	68	- 91			6	12	- 82
560	6/16-10/31	30	1	--	29	90	- 68			47	76	- 16
561	6/14-10/31	819	5	--	814	761	+ 7			49	863	+ 13
564	6/16-10/31	94	7	--	87	127	- 31			50	137	+ 8
576	6/14-9/1	58	4	--	54	56	- 4			12	66	+ 18
586	6/16-10/31	63	1	--	62	225	- 72			55	117	- 48
591	6/7-9/1	151	11	--	140	492	- 72			60	200	- 59
592	5/21-9/1	12	---	--	12	30	- 60			12	24	- 2
594	6/7-9/1	22	1	--	21	63	- 67			3	24	- 62
596	6/1-9/1	33	2	--	31	74	- 58			36	67	- 9
598	5/28-9/1	78	4	--	74	234	- 68			20	94	- 60
Sub-total		2,708	48	--	2,660	4,082	- 35			616	3,276	- 20
SUMMARY:												
Intense		58,189	2,036	2,329	53,824	107,411	- 50	2,592	3,639	46,736	106,791	- 1
Less Intense		2,708	48	--	2,660	4,082	- 35			616	3,276	- 20
*Mgmt w/Private		2,193	68	--	2,125	1,629	+ 30**			335	2,480	+ 52
GRAND TOTAL		63,090	2,152	2,329	58,609	113,122	- 48	2,592	3,639	47,707	112,547	+ 3

* This management level is the same as proposed action, except, it does not have brush control and seeding included.

** Most of the increased allocation (742 AUM's) in this category is due to the licensing of allotments previously unlicensed.

Livestock Grazing Management

Allotments placed in the intensive management, less intensive management and management with private lands categories in the proposed action would remain in these categories. The development of an allotment management plan and use of the term "intensive livestock management" does not imply that resources are being used only to benefit the livestock grazing activity. Intensive livestock management is the application of techniques designed to benefit all rangeland resource values. These techniques include designation of proper intensity and period of livestock grazing, application of specific grazing systems designed to achieve specific resource objectives, and design of range improvements to benefit livestock, wildlife, wild horses, and the soil and vegetation resources.

Grazing systems would remain the same as described in Alternative 3 except on critical mule deer winter range. Rotation systems specifically designed to enhance bitterbrush, a key deer forage, would be implemented on allotments within critical mule deer winter range. These allotments are 503, 539, 554, 595, 505, 540, 556, 600, 526, 541 and 593.

Following is an example of the type of grazing system that would be applied on critical mule deer winter ranges. The order in which treatments would be applied is as follows:

Year		Grazing Treatment	Main Benefit of Treatment
1	A	No grazing (rest)	restore plant vigor
2	B	No grazing | graze*	seed production, trampling of seed and livestock production
3	C	No grazing	seedling establishment
4	D	Graze	livestock production (May - Sept 1)

* Grazing would begin at the seedripe date of bitterbrush under this treatment.

The four treatments would be applied to four pastures of an allotment through a complete cycle as follows:

	Pastures			
Year	1	2	3	4
	Treatments			
1	A	B	C	D
2	B	C	D	A
3	C	D	A	B
4	D	A	B	C
5	A	B	C	D

Season-of-use dates would be as described for Alternative 3 except on allotments 504, 582, 610 and 623. These allotments are in the management with private lands category and support high concentrations of deer during winter seasons. To remove a potential conflict between livestock and deer use on winter range areas, grazing use on these allotments would only be allowed between June 1 and September 1.

Project Development and Land Treatment

The timing and amount of funding is based on actual past funding levels available to other Idaho BLM districts that have completed grazing EISs. The funding for new projects would be approximately 40 percent of what would be required for new projects described in the proposed action.

Funding for additional project development would be provided primarily in the fourth through seventh years after the EIS is completed. Funding in the first through third years after completion of the EIS would be sufficient to maintain existing projects and construct a limited amount of new projects. Funding in the eighth year and thereafter would be sufficient to maintain all projects but not to construct new ones.

The assumed level of funding for years one through seven is as follows:

YEAR	DOLLARS
1	$25,000
2	$30,000
3	$40,000
4	$300,000
5	$375,000
6	$470,000
7	$585,000
TOTAL	$1,825,000

Project development would be lower than in the proposed action, constrained by the assumed lower level of funding. Land treatments (burning, spraying, chaining and seeding) would only be done on sites in poor condition and not predicted to improve to good condition without treatment. Project development and maintenance cost of this alternative are summarized in Table 5. Proposed development by allotment is shown in Table 6 and Map 2.

Project design specifications and standard operating procedures as described in the proposed action would be followed. These project layout and construction features are designed to enhance wildlife habitat components.

Monitoring Programs

Monitoring programs described in the proposed action would be implemented. Utilization studies on all allotments would be conducted in addition to condition and trend studies. Condition and trend studies would be completed after each cycle of the grazing systems. In those

Table 5
Project Development and Maintenance Cost - Alternative 7

Project	Units	Unit Cost	Total Cost	Existing Projects	Maintenance Responsibility	Annual Maintenance Cost/Unit	Annual Maintenance Cost (Existing & Proposed)
Pasture Fence	128 mi.	$2,300	$ 294,400	633 mi	Permittee	$70	$53,270
Exclosure Fence	113 mi.	$2,900	$ 327,700	12 mi	BLM	$90	$11,250
Log Structure	37 mi.	$1,000	$ 37,000	0	BLM	Unknown	Unknown
Pipelines	5 mi.	$4,500	$ 22,500	16 mi	Permittee1/	$180	$ 3,780
Well	0	0	$ 0	5	BLM	Unknown	Unknown
Spring	68	$1,600	$ 108,800	185	Permittee	$50	$12,650
Reservoir	67	$7,800	$ 522,600	201	BLM	$80	$21,440
Brush Control	18,000 ac.	$ 6	$ 108,000	9,500	BLM	Unknown	Unknown
Brush Control & Seeding	17,000 ac.	$ 18	$ 306,000	31,800	BLM	Unknown	Unknown
Total			$1,727,000				$102,390

1/ BLM would maintain pumps and generators and would fill storage tanks prior to the grazing season. Associated costs, however, would be carried by permittees.

Table 6
Alternative 7 - Project Development

Allot.	Springs	Reservoirs	Pipeline	Past. Fence	Exc. Fence	Brush Control	Brush Control & Seed
Intensive Management Allotments							
450							
500		8		5	2.5		4,238
501					10.2	2,167	2,717
502	3			3	3.2		
503				5	1.2		
505							
506	2			8	1		
507				2			
508					3.2		
509							
513							
514		4					
515	4				1.4		
516	2	2		3			
517		5		10	2.5		
518							
519							
521	2	1	1				
522		3					
525	1		1	4	1.4		1,500
526							
529	1						
530							
531	4		2	1			
532		7	1	3			
533	2	1			2.2	1,118	1,075
534		1			1.5		
535							
536							
539	5	1		3	24.3	5,000	4,524
540	4	5			3.7	5,065	1,429
541	3	7		17	4.5	4,792	1,957
542							
546		7		1	2		
548	7	3			9.6		
549	1	2					
550	3	2					
551	7						
552				2			
553				3			
554	9	2		6			
556					2.1		
557	1						
562				1	1.5		
563				3	1.6		
565							
568				1			
569				11	4		
570					.2		
571							
572				3			
573	4			6			
574							
578							
579					2.1		
580					1		
581							
585							
587	3	1		2	.3		
589				6			
590							
593		1			1.4		
595				1	5.2		
597				3			
599				12	3.4		
600					3.0		
601							
602							
603		4		3			

The only project development that would occur in the less intensive and management with private land allotments would be stream exclosure fencing as follows:

Allotment	Miles
520	3.9
560	1.3
561	6.1

	Springs	Reservoirs	Pipeline	Past. Fence	Exc. Fence	Brush Control	Brush Control & Seed
Total	68	67	5	128	113	18,142	17,440

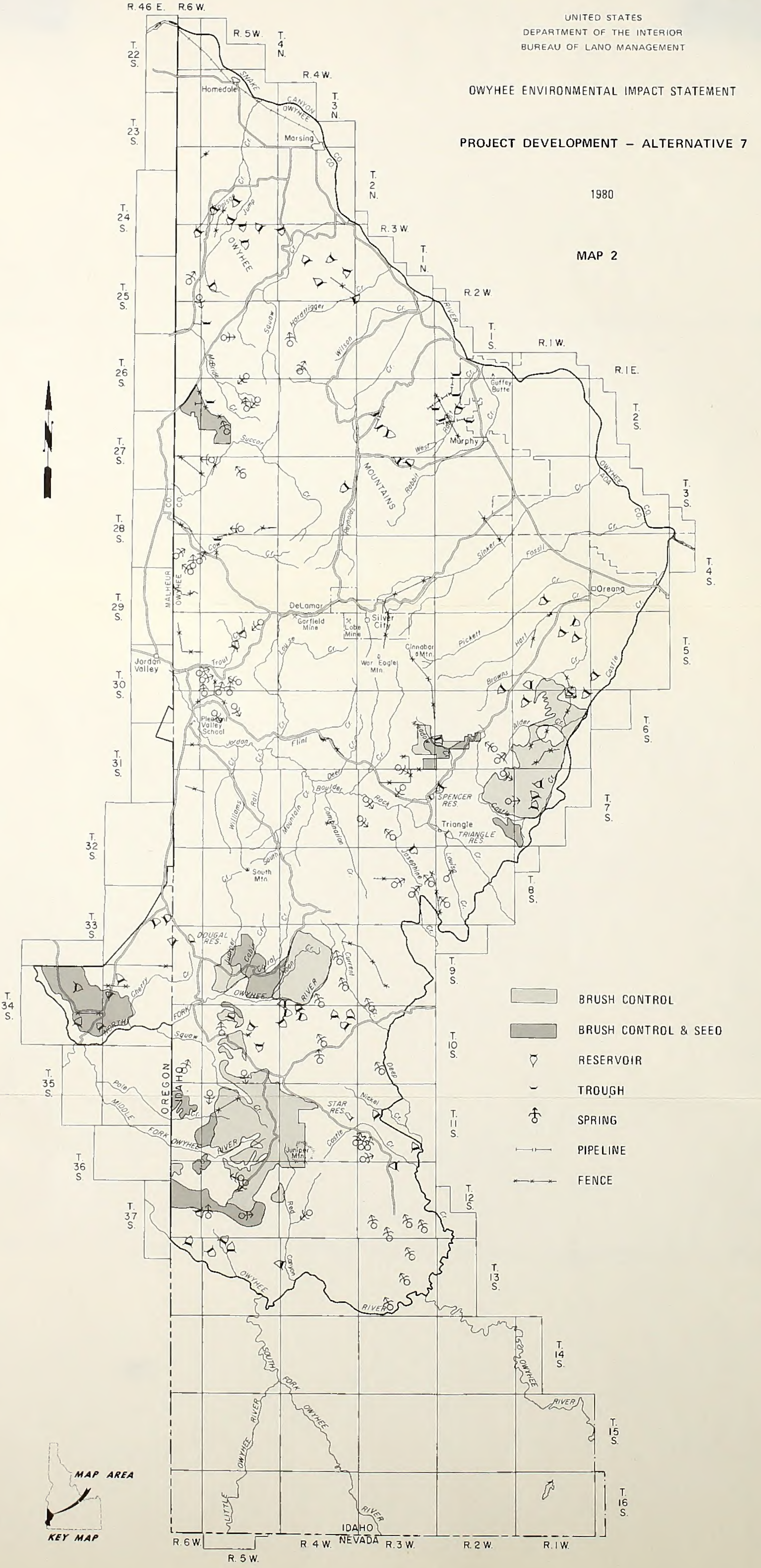
UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

OWYHEE ENVIRONMENTAL IMPACT STATEMENT

PROJECT DEVELOPMENT – ALTERNATIVE 7

1980

MAP 2



allotments containing critical mule deer winter range, specific bitterbrush utilization studies would be set up and monitored to insure livestock use does not exceed 30 percent of the current year's production.

Implementation Schedule

Adjustments in livestock use would be made within a three-year period following completion of the EIS.

All project development would be completed by the seventh year in accordance with the anticipated funding levels previously described.

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE 7

VEGETATION

Introduction

Heavy spring use is detrimental to perennial grasses (Craddock and Forsling 1938). Dillion and Wallenmeyer report one Oregon rancher to say "...when we quit grazing on bunchgrass during May and June, it (the grass) really started to come."

This example, indicates refraining from spring grazing entirely may be the best way to improve bluebunch wheatgrass. Late summer and fall grazing has caused heavy livestock use on browse species (see wildlife section). The heavy browse use has lowered individual plant vigor below levels needed for satisfactory seed production, particularly on deer winter range.

For these reasons, season-of-use adjustments and grazing system designs were made to minimize livestock grazing conflicts with plant protection, browse seedling establishment, and fall browse use on deer winter range.

Condition and Trend

Grazing Management:

The proposed grazing management (special rest rotation systems on deer winter range) would enhance browse species vigor recovery and seedling establishment. These changes, however, are directed at a small portion of the ecological community. For example; bitterbrush may comprise only ten to twenty percent of an ecological site. As a result, the change in vegetative composition would not be enough to change condition class from that described in Alternative 3 (pages 4-80 and 4-81 Draft EIS).

Land Treatments:

The areas scheduled for treatment are in poor condition. These areas can be characterized by dense stands of sagebrush and/or juniper (over 50 percent of plant composition) with low vigored desirable grasses and shrubs.

Treatment impacts on condition would be the same as those described in the proposed action (pages 4-6 through 4-8, Draft EIS).

Appendix G in the Draft EIS describes how treatment acreages are calculated into net condition responses. Implementation of the proposed treatments would require treatment of 35,578 acres (3.5 percent of EIS area) of poor condition range that would not improve if left untreated.

Cover

Grazing Management:

Effective ground cover would increase an estimated five to ten percent over the entire area as described in Alternative 3 (pages 4-81 and 4-82 Draft EIS).

Land Treatments:

Land treatments are scheduled for ecological sites in poor condition. These sites currently exhibit average effective ground cover of 55 to 70 percent (Appendix Table F-2, Draft EIS). Short-term (one to three years) cover losses can be expected because of the initial sagebrush kill and delays in recovering residual plant vigor. However, land treatments in the EIS area have exhibited (after three years) average effective ground covers of 60 to 80 percent (an increase of five to ten percent over present conditions. These increases were obtained from basal cover of grasses and forbs and the resprouting of certain shrub species. Proposed treatments (35,578 acres) are expected to respond similarly.

Productivity

Grazing Management:

Useable forage would increase from 50 pounds per acre to 87 pounds per acre. Total air-dry useable forage would increase 38,165,000 pounds (47,707 cattle AUMs) as described in Alternative 3.

Land Treatments:

The productivity of herbaceous plants is expected to improve. Nielson and Hinckley (1975) report that yields from a loam range site produced 221 pounds per acre air-dry forage before spraying and 842 pounds per acre air-dry forage after spraying. In one study, grazing capacity for sheep and cattle increased an average of 70 percent on several burned sagebrush-grass ranges (Pechanec et al. 1954, revised).

Ranges scheduled for seeding plus brush control are currently the least productive from a useable forage standpoint. Pechanec et al. (1954, revised) found on ranges needing reseeding, the carrying capacity was increased five to twelve-fold before pretreatment values.

Observations in the EIS area, where brush was previously controlled, indicated average carrying capacities of seven acres per AUM. When brush controlled areas were seeded, average carrying capacities of four acres per AUM were observed (Anderson 1979, personal communication). While it is recognized that post treatment productivity can vary from site to site, the average observed EIS post treatment carrying capacities were used for this impact analysis. Treatments would make an additional 4,984,800 air-dry pounds of useable forage available for allocation (equivalent to 6,231 cattle AUMs). This increase averages 4.9 pounds per EIS area acre.

Meadow/Riparian Vegetation

Little or no change is expected in this community. Most improvement would occur in the riparian portion from the installation of protective fencing and log structures.

Range Improvements

Obtaining uniform livestock distribution on cattle range is a major management problem (Phillips 1965). In the EIS area as on other mountain ranges, cattle normally graze heavily on bottomland near water before moving onto the steeper upland country. Range improvements would be installed to improve existing utilization patterns (see Map 2). Poor grazing distribution can cause difficulty in improving range conditions even when numbers of livestock are in balance (Johnson 1965).

Each spring installation would disturb approximately 1.5 acres. Total disturbance from all springs would equal 102 acres, of which 90 percent are scheduled for fencing. The fenced areas (91 acres) would be revegetated naturally or artificially in one to three years. There would be long-term vegetation impacts on eleven acres because of loss of vegetation.

The installation of 67 reservoirs would withdraw approximately 134 acres of rangeland from production. Several of the reservoirs (80 percent) are scheduled for fencing (107 acres). Revegetation (natural or artificial) would occur in one to three years. The remaining 27 acres would have little or no vegetation.

There are five miles of pipeline proposed for development. This would impact about 2.5 acres of vegetation per mile of pipeline (thirteen acres). While mitigating measures call for revegetation of the thirteen acres, pipeline maintenance requirements could turn pipeline right-of-ways into roads. For this reason, revegetation of these areas (worst case analysis) is predicted to fail or be inadequate for soil protection (see soils section).

No adverse impacts are recognized because of the proposed pasture fencing (128 miles).

Range improvements would adversely impact up to 51 acres of vegetation. The lack of existing data and appropriate literature makes precise quantification of impacts impossible; however, the impact of improving livestock grazing distribution would have positive value.

Summary

The desired ecological condition class acreage stated in the objectives would be attained within the twenty-year planning period.

Existing ecological condition on upland and meadow/riparian bottomland would improve from proposed grazing management, range improvements, riparian area fencing and log structures. A comparison of existing and twenty-year ecological conditions is presented in Table 7.

Table 7
Condition Class Summary
Alternative 7, for Public Lands in EIS Area [1]

Ecological Condition Class	Initial Ecological Condition Meadow/Riparian Areas	Total EIS Area	20-Year Ecological Condition Meadow/Riparian Areas	Total EIS Area
Poor	14.5	56.8	2.6	22.5
Fair	78.9	35.2	79.3	35.0
Good	6.6	5.1	18.1	31.4
Excellent	---	0.3	---	5.8
Treated	---	2.6	---	5.3
Total Percent	100.0	100.0	100.0	100.0

[1] Values are percent of area acres within each condition class. Currently, there are 9,718 acres of meadow/riparian vegetation in the 1,014,296 acre EIS area.

Effective ground cover would improve five to ten percent on the EIS area.

Grazing management and land treatments would improve productivity of useable forage by 43,150,400 air-dry pounds. Net increases of useable forage are summarized in Table 8. An allotment summary of net livestock AUM production gains is presented in Table 4.

Table 8
Alternative 7, Useable Forage Summary [1]

	Pounds	AUMs
Existing	50,472,000	63,090
20-Year	93,622,400	117,028
Net Gain	43,150,400	53,938

[1] Useable competitive livestock forage at biological limit utilization levels.

Vegetative condition by allotment would be as described for Alternative 3 (Appendix Table F-9, Draft EIS) except in allotments which have land treatment proposed. These changes are summarized on Table 9.

Table 9
Alternative 7, Condition Class in 20 Years

Allot.	Poor	Fair	Good	Excellent	Treated	Total
Intensive Management (Acres)						
501	4,124.0	5,700.3	3,105.4	328.0	4,883.0	18,140.7
525	214.5	1,714.5	1,050.5	2,426.0	1,794.0	7,199.5
533	---	1,040.0	2,863.0	10.0	2,192.0	6,105.0
539	14,619.3	31,265.8	38,620.9	4,729.6	9,608.0	98,843.6
540	56.8	15,888.6	18,895.7	3,068.7	6,493.0	44,402.8
541	---	712.5	26,558.5	4,942.0	6,748.0	38,961.0
Sub Total - Intensive Management Allotments						
	213,671.2	337.391.8	297,807.4	56,014.0	54,393.0	959,277.4
Grand Total - All Allotments						
	228,010.7	354,633.3	318,116.9	59,013.3	54,522	1,014,296.2
Percent	22.5	35.0	31.4	5.8	5.3	100.0

SOILS

The long-term effects of Alternative 7 would increase the soil organic component, which would increase soil fertility and productivity. Improving canopy cover would increase infiltration rates by breaking up sheet flow and allowing more water to enter the soil profiles. This would decrease runoff and the potential for erosion.

The impacts of Alternative 7 would be similar to Alternative 3. Keeping utilization on bitterbrush to 30 percent may indirectly decrease the overall utilization of the vegetation in some pastures during certain seasons. This would decrease the impacts of livestock grazing on the affected pastures but the net effects would not be significant.

Alternative 7 recommends land treatment on allotments 500, 525, 533, 539, 540 and 541. Impacts of treatment on these areas would be the same as described in the proposed action (pages 4-13 and 4-14, Draft EIS). The short-term effects of this land treatment would be a 1 to 3 year increase in soil erosion; however, the long-term erosion rates should improve over the present condition. The long-term improvement in erosion rates for these allotments is shown below:

	Present Erosion Rate ton/acre/year	Decrease in erosion rate
500	0.45	16%
525	1.50	11%
533	1.06	19%
539	0.83	17%
540	0.79	17%
541	1.53	24%

The long-term improvement in erosion rates on other allotments would be as described in Alternative 3.

Summary

In twenty years, the overall annual erosion rates would be seventeen percent less than present (1.12 tons/acre/year to 0.92 tons/acre/year). This is eight percent more than the optimum excellent condition watershed.

WATER RESOURCES

Watershed Condition

This alternative would create high improvement in overall upland watershed condition (Table 10). Increases in ground cover would reduce runoff causing decreased erosion rates. Sediment and other contaminants would remain in a localized area.

Impacts of spring, reservoir and fence construction would be as described in the proposed action except the magnitude of development would change. Proposed development and their impacts are as follows:

Development Causing Impact	Area Impacted
68 springs	92 acres (0.9% of existing riparian vegetation)
67 reservoirs	107 acres (1.0% of existing riparian vegetation)
113 miles stream fenced	113 stream miles

Water Availability

Development	Estimated Annual Yield
68 springs	125 acre-feet (37% increase in available developed water)
67 reservoirs	135 acre-feet (37% increase in available developed water)

Developments	Impact on downstream water users
Reservoirs	0.11% of Snake River watershed would be retained. 0.01% of the Owyhee River watershed would be retained.

Table 10
Summary of Projected Changes in Watershed Conditions on Allotments Important to Water Resources*

Allot.	Erosion	Ground Cover	Range Condition	Land Treatment	Overall Rating
505	++	++	+	0	++
509	+	++	++	0	++
515	+	+	++	0	+
516	++	++	+	0	++
525	0	0	+	++	+
531	+	+	+	0	+
534	+	++	++	0	++
535	++	++	+	0	++
556	+	+	++	0	+
571	+	+	+	0	+
578	++	++	+	0	++
580	+	+	+	0	+
585	+	+	0	0	+
602	+	+	+	0	+
558	+	+	+	0	+
561	++	++	+	0	++
586	+	+	+	0	+
592	+	+	+	0	+
463	++	++	0	0	+
466	++	++	0	0	+
472	++	++	0	0	+
477	+	++	0	0	+
483	++	++	+	0	++
486	++	++	0	0	+
487	++	++	0	0	+
511	+	+	0	0	+
607	+	+	0	0	+
609	+	+	0	0	+
620	+	+	+	0	+

Erosion: 0 is less than 10% change in erosion
+ is a 10-19% reduction in erosion
- is a 10-19% increase in erosion
++ is more than 20% reduction in erosion
-- is more than 20% increase in erosion

Ground Cover: 0 is less than 5% change in ground cover
+,0 is 5-9% change in ground cover
++,-- is more than 10% change in ground cover

Range Condition: 0 is less than 13% change in range condition
+,- is 13-24% change in range condition
++,-- is more than 25% change in range condition

Land Treatment: 0 is less than 10% of allotment acreage treated
+ is 10-19% of allotment acreage treated
++ is more than 20% of allotment acreage treated

* Allotments analyzed lie on or adjacent to streams. They are characterized by high or low susceptibility to sheet erosion and/or they represent extremes in predicted responses to changes in erosion rates and/or ground cover.

Water Use

Initial consumption by livestock and wildlife would decrease by nine percent, from 125 acre-feet to 114 acre-feet annually, or .03 percent of the annual water yield.

Water needed for irrigation would not change, but the amount of water available during spring runoff would be reduced slightly from improved vegetation cover.

TERRESTRIAL WILDLIFE

Alternative 7 was designed with the concept of addressing wildlife needs to the fullest while decreasing use by livestock and wild horses. Under this alternative, wild horses would be managed at proposed action levels to reduce competition with wildlife for available forage.

Mule Deer

This alternative would be the most beneficial to mule deer populations. All livestock grazing on winter range would be discontinued after September 1. All allotments within the critical winter range would be put into a 3 or 4-pasture rest-rotation grazing system. This would develop increased vigor of forage and cover for wintering deer populations.

A thirty percent utilization limit would be implemented on critical mule deer winter range where bitterbrush is present. Since this species is a critical food source during winter months, a higher winter survival rate and higher spring productivity rates would be expected to occur due to better physiological condition of winter deer populations.

BLM lands managed with private lands located in critical winter range would have specified season-of-use, with all grazing discontinued after September 1. This would allow more available cover and forage for deer in these areas.

Vegetative treatments would be implemented where most needed. These treatments would improve habitat conditions and available forage by improving ranges that are in poor condition. The development of springs and reservoirs would increase the present range of populations of the area. This alternative would meet management objectives for habitat conditions and population numbers.

Antelope

Antelope populations would highly benefit from treatments and limited livestock grazing. Less competition on antelope ranges would afford more forage and cover for present populations. This alternative would meet management objectives for habitat condition and population numbers.

Bighorn Sheep

With lower utilization levels and no reservoirs being developed in bighorn areas, the population would meet the objective proposed by management. Provisions for allocating additional forage if needed in expansion areas would insure adequate forage to meet population needs.

Sage Grouse

The exclusion of livestock utilization on 113 miles of riparian habitat would greatly improve sage grouse brood rearing habitat. Nesting success would increase from improved habitat conditions. Management objectives would be met under this alternative.

Waterfowl

Since this alternative would develop reservoirs with protective fencing, more nesting habitat and open water would be available. These actions would enhance the waterfowl populations of the area.

Riparian Associated Wildlife

With 113 miles of riparian habitat being fenced, all wildlife species using these areas would benefit. Meadows would also improve from lower utilization levels. Management objectives would be met.

Summary

Alternative 7 would provide the most substantial improvement to all wildlife habitat (Table 11). With lower livestock utilization levels, more forage and cover would be available.

Vegetative treatments would be implemented where they are most needed. This would improve habitat that has almost no wildlife value. Mule deer, antelope, sage grouse and all wildlife populations would meet management objectives if this alternative is implemented.

Table 11
Wildlife Summary/Alternative 7

	Existing Situation (Acres/%)			Impact of Alternative (Acres/%)		
	Good	Fair	Poor	Good	Fair	Poor
Mule Deer						
Summer Range	20,670/ 5%	157,092/ 38%	235,638/ 57%	165,328/ 40%	169,494/ 41%	78,578/ 19%
Winter Range	27,580/ 7%	145,780/ 37%	220,640/ 56%	159,430/ 40%	157,600/ 40%	76,970/ 20%
Antelope	21,375/ 5%	158,175/ 37%	247,950/ 58%	166,725/ 39%	162,450/ 38%	98,325/ 23%
Bighorn Sheep	5,382/ 69%	2,028/ 26%	390/ 5%	6,318/ 81%	1,092/ 14%	390/ 5%
Sage Grouse (nesting)	7,504/ 4%	69,412/ 37%	110,684/ 59%	67,536/ 36%	75,040/ 40%	45,024/ 24%
Meadow/ Riparian Associated Wildlife	485/ 5%	8,730/ 90%	485/ 5%	1,746/ 18%	7,663/ 79%	291/ 3%

AQUATIC WILDLIFE

Impacts to aquatic wildlife would be similar to those outlined in Alternative 3. However, fencing on 113 stream miles to exclude livestock would show a beneficial response five years earlier than in the proposed action on approximately 60 percent of these stream miles. The improved rate of response would apply to the percentage of the 113 stream miles slated to be fenced for other than livestock exclusion in the proposed action in areas where the stream objective outlined in the proposed action is not attained after five years of implementation.

WILD HORSES

Impacts would be the same as the proposed action, except three miles of pasture fence in allotment 508 would not be constructed, thereby eliminating the movement restriction within this allotment. Under this alternative, installation of range improvement projects, implementation of rotation systems for livestock grazing management, vegetation manipulation projects and additional available AUMs allocated to the wild horses would be the same as the proposed action.

CULTURAL RESOURCES

Slight beneficial impacts may occur to cultural resource sites presently suffering from erosion due to increased vegetative cover, implementing grazing systems at biological limit levels and the implementation of vegetative treatments.

WILDERNESS

Lands under wilderness review would be managed under the Interim Management Policy (page 2-14, Standard Operating Procedures, Draft EIS) so their suitability for preservation as wilderness would not be impaired. All aspects of this alternative, with the exception of vegetative manipulation, would have a beneficial effect on scenic qualities, fish and wilderness associated wildlife habitat, and the general natural character of some of the lands under wilderness review. Vegetative manipulation by chemical or mechanical methods is prohibited on any lands under wilderness review because such methods cannot comply with the "nonimpairment" standard using normal methods of development.

VISUAL RESOURCES

This alternative would have positive visual impacts. Vegetative treatments designed to enhance wildlife habitat would compliment scenic quality on areas to be treated. The natural character of the bighorn sheep range associated with Class I areas would be preserved. Reduction in the amount of fencing and water development from levels described in the proposed action would reduce the amount of man-made intrusions.

RECREATION

Off-Road Vehicle Use

ORV use would be restricted by the construction of fences and seasonal closures of popular ORV areas.

Hunting and Fishing

Since this alternative is designed to optimize wildlife benefits, improved habitat conditions would create significant increases in populations of all huntable species of wildlife and in the number of game fish.

Improved habitat conditions for fish and wildlife would create significant improvement in fishing and hunting opportunities. Table 12 summarizes estimated recreation use with and without implementation of Alternative 7:

Table 12
Recreation Use [1]

	Existing Situation	Alt. 7 Year 2000	No Action Year 2000 [2]
Off-Road Vehicle	175,000	300,000	300,000
Hunting	97,585	195,000	140,000
Fishing	724	1,700	1,100
	273,309	496,700	441,100

[1] Activity occasions.
[2] This represents a continuation of current trends.

LIVESTOCK GRAZING

Under this alternative, seventeen allotments would have an increase from 3,747 to 5,196 active preference AUMs. Livestock would be reduced 51 percent on 94 allotments from 109,375 AUMs to 53,413 AUMs. There would be an additional 742 AUMs on 32 allotments under the classification of public lands managed with private lands.

To compensate for reductions in AUMs or less grazing on public lands, livestock operators would have to buy hay, lease pasture, reduce numbers, or rely on grazing privileges on other lands (e.g. state).

In twenty years, there should be an increased production of forage for livestock (53,938 AUMs) from grazing management systems, reduced horse numbers and seeding projects on six allotments. This 112,547 AUM level would be less than one percent below current active preference.

Summary

The alternative calls for a 48 percent reduction in livestock use from active preference. The majority of this reduction would be on 94 allotments which would have a net reduction of 51 percent from active preference. In twenty years, this alternative, with the help of grazing management systems, vegetative manipulations and reduced horse numbers would increase the AUM level by 72 percent (112,547 AUMs) from the initial alternative level but not to active preference (113,122 AUMs). Table 13 shows the summary of AUM allocation for this alternative. For allotment specific AUM allocation see Table 4.

Table 13
Summary of AUM Allocation for Alternative 7

	Total Available	Wild-life	Horses	Livestock Allocation	Percent Change*
Initial	63,090	2,152	2,329	58,609	-48
20-Year Projection	117,028	2,152	2,329	112,547	- 1

* The percent change from active preference.

ECONOMICS

Rancher Income

This alternative would impose a 48 percent reduction in AUMs from current active preference. It would be a 44 percent reduction from the five-year (1974-78) average actual use. Table 14 shows AUMs by size group and the AUM changes from active preference and average use.

Ranchers could adjust to these reductions as identified in the proposed action. The remainder of this analysis is based on the substitution of hay for Bureau of Land Management AUMs and vice versa (as in the proposed action). Changes in AUM levels are measured against the five-year average actual use levels as in the proposed action.

To replace lost AUMs with purchased hay (or hay held back from sale) would cost permittees $705,000 annually in the short-term. As the range improved through range improvements, treatments and proper stocking rates, the ranchers could regain these lost AUMs. By the twentieth year of this alternative, there would be seven percent more AUMs than the average actual use and an income gain of $92,000. Table 15 shows the average change per operator by size class for the short and long-term.

The net present worth of the change in net rancher income would be -$5.9 million.

The total rancher income losses could be considerably larger since this alternative calls for large reductions in spring grazing. Such reductions force ranchers to hold cattle on their private lands, preventing use of that land for hay and grain production. This additional impact is not quantifiable.

Table 14
Owyhee EIS Area
Size Group Data
Alternative 7

Group	Herd Size	Number of Cattle	Number of Sheep	Active AUMs	Average AUMs	Proposed AUMs 1/	Loss from Active		Loss from Average	
							Number	Percent	Number	Percent
1	0-149	1,340	0	7,599	7,592	4,016	3,583	47	3,576	47
2	150-399	7,429	0	22,284	22,584	12,603	9,681	43	9,981	44
3	400+	26,801	12,200	83,239	74,833	41,247	41,992	50	33,586	45
TOTAL	---	35,570	12,200	113,122	105,009	57,866	55,256	49	47,143	45

1/ Excludes those areas not previously licensed (i.e. fenced federal ranges, pasture 3 of allotment 515, allotments 610, 618, 620 and 621).

Table 15
Owyhee EIS
Income Changes by Group
Alternative 7

Size Group	Base Income (See Chap. 3)	Average Short-Term Change* (dollars)	Average Short-Term Revised Income	Average Short-Term Percent Change	Average Long-Term Change* (dollars)	Average Long-Term Revised Income	Average Long-Term Percent Change
1	$16,394	-$ 4,010	$12,384	-25%	-$99	$16,295	-1%
2	$25,605	-$ 5,875	$19,730	-23%	-$384	$25,221	-2%
3	$49,193	-$12,857	$36,336	-26%	-$2,919	$52,112	+6%

* These impacts to rancher income have been calculated through the use of ranch budgeting and linear programming techniques which are explained in Appendix L, Draft EIS.

SOURCE: Bureau of Land Management, Idaho State Office, July 1980.

Regional Income

In the three-county EIS study area, approximately $275,000 in net income would be gained from construction of range improvements and land treatments. In addition, there would be $66,000 gained from twenty years of maintenance of these projects. The remainder of the range improvement and land treatment costs would be incurred outside the region. This direct impact to the region's construction industry would have little input on the remainder of the regional economy.

The net present worth of range improvements and land treatments to the regional economy would be +$244,600.

The direct income loss to the ranching community would cause secondary losses to the livestock industry and other sectors of the regional economy. These secondary losses would be $274,000 annually in the first ten years, $137,000 annually in years eleven through fifteen, and $69,000 annually in years eleven to twenty.

The net present worth of these livestock-related secondary annual income changes would be -$2.3 million.

This alternative would increase the number of hunting and fishing days above that expected if no action is taken (see recreation section). At the end of twenty years, there would be approximately 600 additional fisherman days and 55,000 additional hunter days. Based on income per hunter and fisherman day data (U.S.D.A. 1979), the net income in the services and retail trade sectors of the economy would increase by $581,000 annually by the twentieth year. Secondary income gains throughout the entire economy from recreation gains would be up to $71,000 annually by the twentieth year.

The net present worth of these recreation-related income gains would be +$2.8 million.

The total net present worth to the regional economy from implementing this alternative (over twenty years) would be -$5.2 million and is comprised of the following:

Direct Livestock Losses	-$5.9 million
Secondary Livestock Losses	-$2.3 million
Range Improvements and Land Treatments	+$0.2 million
Recreational Use	+$2.8 million

Employment

There would be a direct loss of 69 jobs in the livestock industry from this alternative. By the tenth year there would be 28 direct jobs gained in services and retail trade from increased recreational use. There would be 25 secondary losses through year ten; the major losers being the livestock industry (-3 jobs), food and related products (-5 jobs), and other manufacturing (-5 jobs). By the end of the fifteenth year, the total employment losses would be two jobs (in other words 92 jobs would have been gained back). By the twentieth year, the employment losses would be eliminated and 34 jobs (primarily recreation-related) would be gained.

Ranch Consolidation

Impacts on ranch consolidations would be the same as in Alternative 3.

Capital Position

This alternative would impact capital position in the same manner as Alternative 3.

Other Impacts

This alternative would cost the federal government $2.0 million over twenty years for installation and maintenance of range improvements and land treatments. This would have a net present value of $1.4 million.

The losses in grazing fee collection would be similar to Alternative 3 and would have a net present worth of $840,000.

Summary

The annual regional net income changes within the livestock industry would have a net present worth of -$8.2 million. Changes in the regional economy from range improvement construction and maintenance would have a net present value of +$245,000. Regional income changes from increased recreational use would have a net present worth of $2.8 million. Total employment losses would be 66 jobs through year ten, two jobs by year fifteen, and by year twenty, employment losses would be eliminated and 34 jobs gained. At least 25 permittees would have difficulty remaining in business.

The net present worth of range improvements and maintenance to the federal government would be -$1.4 million. The present worth to the state and federal governments from reduced grazing fee receipts would be -$840,000.

The total net present worth of this alternative (regional, state, federal) would be -$7.4 million.

SOCIAL CONDITIONS

Under this alternative, 25 of 83 permittees or 30 percent may have difficulty remaining in business. There would be four permittees or five percent that would realize increases above their five-year average use. The effects on the social values and attitudes of the ranchers and communities would be similar to those discussed in the proposed action, except there would be more reductions and less increases in AUMs. Recreation users would be pleased with the improved recreation opportunities provided by this alternative.

COMMENTS AND RESPONSES

All letters and public hearing comments were reviewed and considered in the preparation of the Final EIS. Table 2 lists the letters that were received and the individuals who gave oral testimony at the public hearings.

Although all public input will be considered when management decisions for the Owyhee area are made, only comments that presented new data, questioned facts or the adequacy of the impact analysis and raised questions or issues bearing directly upon the Draft EIS were responded to in this Final EIS. The text change section indicates how the Draft EIS was changed to respond to these comments where necessary.

Response to Letters

Each letter received during the review period is presented in full with a response(s), where appropriate, following the letter. Each substantive comment has been numbered. The response to each comment follows the letter with a corresponding number. The letters are presented in the order they were received.

Repsonse to Public Hearing Testimony

All oral testimony was reviewed from the public hearing transcripts. Comments that required a response are quoted verbatim and are followed by the corresponding response.

Table 2
Comment Letters and Hearings Testimony

Letters from Individuals, Agencies and Organizations

Letter No.	
1.	R. T. Nahas Company
2.	U.S. Soil Conservation Service
3.	Oregon Department of Fish and Wildlife
4.	Oregon State Historic Preservation Office
5.	U.S. National Park Service
6.	David P. Tidwell
7.	Marjorie Hays
8.	Adam H. Blackstock
9.	Idaho Department of Fish and Game
10.	Oregon Department of Agriculture
11.	Richard S. Bennett
12.	Wes and Wendy Downs
13.	The Wildlife Society, Idaho Chapter
14.	Elias Jaca and Richard Gabica
15.	Tom Collett
16.	Tim Lowry
17.	Ted Trueblood
18.	Idaho Wildlife Federation - Third District
19.	Environmental Protection Agency, Region X
20.	Bill Lowry
21.	Idaho Wildlife Federation
22.	Richard Bass
23.	B.S.U. Conservation Group
24.	Bill and Phyllis Ross
25.	Wild Horse Organized Assistance Inc.
26.	U.S. Fish and Wildlife Service, Area Office
27.	Governor John V. Evans
28.	Mark Shenk
29.	Southwest Idaho Development Association
30.	Bruneau River Soil Conservation District

Individuals Testifying at Public Hearings

No.	Speaker	Representing
		BOISE
31	Jan Beckwith	Owyhee County Historic Preservation Officer
32	Russ Heughins	Idaho Wildlife Federation - Third District and Idahoans for Public Lands
33	Mike Mogensen	Idaho Cattlemen's Association
34	Tim Lowry	L.U. Ranching Company

Individuals Testifying at Public Hearings (cont.)

No.	Speaker	Representing
		MARSING
35	Mike Hanley	Owyhee Cattlemen's Action Committee and Malheur Cattlemen's Association
36	Neil Rimbey	University of Idaho, Department of Agricultural Economics
37	Dennis Swisher	Self
38	Leon Church	Dave Tidwell, University of Idaho, Rangeland Resources Coordinator
39	John Miller	Miller Land Co., Inc.
40	Mike Mogenson	Idaho Cattlemen's Association
41	Vernita Lowry	Self
42	Ernie Bahem	Owyhee Cattlemen's Action Committee
43	Bill Lowry	Self
44	Karen Bass	Richard Bass
45	Daryl Keck	Self

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1

April 29, 1980

D. Dean Bibles
District Manager
Bureau of Land Management
Boise District
230 Collins Road
Boise, Idaho 83702

Dear Dean:

Thank you so very much for sending me a draft copy of the Owhyee Grazing Environmental Study. I read it with great interest and hope that some how the organization and funds can be found to carry out the program of long-range improvements envisaged.

As a cow and calf operator in the District, I am quite naturally in favor of Alternative 5, which would maximize the use for cattle. I believe based upon my own experience over the last ten years that great progress can be made through the expenditure of money for adequate fencing, spring and creek improvements, brush control and seeding where appropriate. The Department of the Interior and the Federal Government have to bear the principal responsibility for the deterioration of the range. They have not provided either the initiative or the money necessary to improve this vital natural resource. In view of this fact, it seems rather harsh to me to recommend a program that could eliminate by your own statements, the way of life of approximately 25% of the total licensed operators in the area. It would be like me asking the tenants of one of my shopping centers to give up their businesses because as a landlord, I have failed in my obligation to maintain the quality of the property.

I hope that a long range improvement program can be adequately funded and carried out efficiently. Based on past experience, however, I am afraid to be too optimistic.

Very truly yours,

R. T. Nahas

RTN:rb

cc: Mike Hanley, Cecil Andrus, Paul Laxalt

United States Department of Agriculture
Soil Conservation Service

Room 345
304 North 8th Street
Boise, Idaho 83702

May 22, 1980

2

D. Dean Bibles
District Manager
Bureau of Land Management
230 Collins Road
Boise, Idaho 83702

Dear Mr. Bibles:

Thank you for the opportunity to review the Owyhee Grazing Environmental Impact Statement Draft. Our comments are as follows:

- Page ii, first paragraph, last sentence . . . remove the word "artificially".

2.1 - Page 2-5, A.3. and B.3., first sentence, both entries - 25 percent immediate adjustment needs clarification. Is this 25 percent of operator reduction or does this mean that if an operator was to receive a 25 percent reduction in use, in reality a 100 percent reduction would occur immediately?

2.2 - Page 3-3, Table 3-1 - appears to be incomplete.

2.3 - Page 3-11, Terrestrial Wildlife - Are cattle and deer really that competitive? What grazing system are you establishing for critical deer winter range? Do you have a comparison existing diet for livestock?

General:

2.4 - The impacts on prime farmland (associated), have not been specifically addressed. From this, I assume there are none in the area of study. Perhaps you should so indicate.

2.5 - The grazing reduction numbers and time schedule would cause pressure on deeded lands to enable the land user to maintain an economical unit. Deterioration of the resource base on deeded lands would occur. Consideration needs to be given to all resources utilized in the ranch operation when developing a range management program. A three year reduction period does not allow time to adjust the operation to effectively minimize the impacts.

2.6 - In addition, further impacts would be delivered to ranch operations subjected to non-use on areas coming under a range improvement (seeding, brush control, etc.) until forage resources are again fulfilled.

- Implementation of many of the 81 springs, 90 reservoirs, 24 miles of pipeline, 100 watering troughs, "some?" miles of fence and the monitoring program, combined with a coordinated resource planning approach to the ranching operation must be considered prior to issuing the proposed grazing reduction schedule.

The Soil Conservation Service is an agency of the Department of Agriculture

2

2.7 - Statements concerning trend are made throughout the document. Do you have long term data to back these statements, or should it be listed as apparent trend?

Sincerely,

Amos I. Garrison, Jr.
State Conservationist

Response to Letter No. 2

2.1 If a rancher is to receive a 25 percent reduction the entire 25 percent reduction would be immediate.

2.2 Table 3-1 is complete but the dates for the 4,000 foot elevation were in error. The corrected dates are shown in the text change section.

2.3 Under moderate stocking rates with ranges in good ecological condition, competition between mule deer and cattle should not be extensive. However, with present poor or fair range conditions and heavy grazing there are few palatable plants. This situation creates competition for the available forage.

On mule deer spring ranges there is competition for the limited perennial bunch grasses, while on winter ranges competition exists for the limited palatable shrubs, paticularily bitterbrush. Appendix Table C-2 of the Draft EIS compares livestock and big game diets.

Various grazing systems, stocking rates and seasons-of-use are proposed on critical deer winter ranges. Specific management proposals for the proposed action and alternatives for a given area can be determined by referring to Appendix Tables C-8, 9, 10, 11, 12 (Proposed Livestock Use), Map 2-4 (Existing Allotments) and Map 3-6 (Big Game). The final decision regarding management of critical deer winter range will be made following the completion of the Final EIS.

2.4 There is prime farmland on public and private land in the EIS area. The economic impact of grazing reductions on the ranch units and the livestock industry was addressed in the economics section of each alternative. No significant impacts were identified on other resources.

2.5 Based on interviews with area ranchers, there was no indication that ranchers would abuse their base ranches to a point that would cause deterioration. They indicated they would purchase additional hay to compensate for lost AUMs or be forced to sell.

2.6 The economic impacts to ranchers reported in the Draft EIS are based on the nonuse they would be required to take during periods of range betterment.

2.7 The term "vegetative trend" is properly used throughout the document. "Apparent trend" data was collected during the vegetative inventory but was not used because of scoring problems on the apparent trend forms. Trend data for the Draft EIS was determined by comparing vegetative condition data collected during 1977 and 1978 with data provided in the Owyhee Project Part II report of 1963. Map and overlay materials associated with resource inventory data (URAs) of the Owyhee upland and Silver City Planning units were originally done in 1966 and revised in 1969, were also used. Since the base condition data was

Response to Letter No. 2 (continued)

collected using the Deming Two Phase Method and present data was collected using a modification of the ecological site method, correction factors were developed to allow comparison of the data. Additional detail on the correlation of data is available upon request from BLM.

STATE OF OREGON
1859
VICTOR ATIYEH
GOVERNOR

Executive Department

155 COTTAGE STREET N.E., SALEM, OREGON 97310

May 27, 1980

Bureau of Land Management
Owyhee Grazing EIS
Boise District Office
230 Collins Road
Boise, Idaho 83702

Dear Sirs:

Owyhee Grazing EIS
PNRS 8004 4 1120

Thank you for submitting your draft Environmental Impact Statement for State of Oregon review and comment.

Your draft was referred to the appropriate state agencies. The Departments of Fish and Wildlife and Historic Preservation offered the enclosed comments which should be addressed in preparation of your final Environmental Impact Statement.

We will expect to receive copies of the final statements as required by Council of Environmental Quality Guidelines.

Sincerely,

INTERGOVERNMENTAL RELATIONS DIVISION

Kay Wilcox,
A-95 Coordinator

KW:cb
Enclosures

OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

3

STATE CLEARINGHOUSE

Intergovernmental Relations Division
155 Cottage St NE , Salem, Oregon, 97310
Phone Number: 378-3732

PNRS STATE REVIEW

Project #: 8004 4 1120 Return Date: ____________

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the review date.

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

( ) This project has no significant environmental impact.

( ) The environmental impact is adequately described.

(X) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.

( ) No comment.

Remarks

The Oregon Department of Fish and Wildlife has reviewed the Owyhee Grazing EIS Draft. Only a small portion of the area described in this Environmental Statement is within Oregon.

3.1 Our only comment relates to interrelationships with other agencies. The draft states that the BLM programs and proposals are closely related to the programs of a number of different agencies. We request that the BLM incorporate the Oregon Department of Fish and Wildlife into this list. The Department should have the opportunity to review and comment on all proposals relating to vegetative manipulation (e.g., spraying, draining, burning, etc.) in the Oregon portion of the EIS area.

We appreciate the opportunity to review and comment on this Statement.

Agency Fish & Wildlife By
ENVIRONMENTAL MANAGEMENT SECTION 5/23/80

Response to Letter No. 3

3.1 The Oregon Department of Fish and Wildlife has been added to those that will be asked to review and comment on vegetative manipulation proposals. See the text change section.

HANCOCK

OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

4

STATE CLEARINGHOUSE
Intergovernmental Relations Division
155 Cottage St NE , Salem, Oregon, 97310
Phone Number: 378-3732

P N R S S T A T E R E V I E W

Project #: ____________ Return Date: ____________

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the review date.

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

( ) This project has no significant environmental impact.

( ) The environmental impact is adequately described.

(X) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.

( ) No comment.

Remarks

OWYHEE GRAZING DRAFT EIS

4.1 LAND TREATMENT WOULD INCLUDE CHAINING - AND CHAINING HAS A HEAVY POTENTIAL IMPACT TO CULTURAL RESOURCES. NOWHERE IN THE DRAFT EIS DID I SEE THE IMPACTS OF CHAINING ON CULTURAL RESOURCES ADDRESSED, OTHER THAN SECTION 2-15 THAT IMPLIES NO SITES WILL BE IMPACTED THROUGH PROJECT CLEARANCE

Agency SHPO By

Response to Letter No. 4

4.1 Given the standard operating procedures for vegetative treatments (including chaining) that are listed on pages 2-14 through 2-17, no impacts from chaining are anticipated on cultural resources.

5

United States Department of the Interior
NATIONAL PARK SERVICE
Pacific Northwest Region
Fourth and Pike Building
Seattle, Washington 98101

IN REPLY REFER TO:
L7619(PNR)PCC

May 27, 1980

Mr. D. Dean Bibles, District Manager
Bureau of Land Management
Boise District Office
230 Collins Road
Boise, Idaho 83702

Dear Mr. Bibles:

We have reviewed the Draft Owyhee Grazing Environmental Impact Statement, Oregon and Idaho, and we have no comments.

Sincerely,

Glenn D. Gallison
Glenn D. Gallison
Associate Regional Director,
Planning and Resource
Preservation

6

RANGELAND RESOURCES COORDINATOR
120 Klotz Lane
Boise, Idaho 83702
(208) 334-3459 or 334-3452

University of Idaho
College of Forestry,
Wildlife and Range Sciences
Moscow, Idaho 83843

May 28, 1980

Mr. Robert Buffington
State Director
Bureau of Land Management
Box 042, Federal Building
Boise, Idaho 83724

Dear Mr. Buffington:

The Owyhee Grazing Environmental Impact Statement is, by far, the most positive, objective and accurate assessment of the environmental impacts of livestock grazing of all the statements prepared by the Bureau of Land Management which I have reviewed to date. The proposed action and the five alternatives in the Draft EIS adequately describe the environmental consequences of a wide variety of management approaches. The wirters have capably demonstrated an acute awareness of the management options required to improve and protect the resources of the Owyhee Resource Area.

The Boise District Manager and his staff in the Owyhee Resource Area are to be commended for their positive approach to this document. This is the first EIS which I have reviewed which has not attempted to lay blame for resource problems upon the livestock operators who use the area. Emphasis was placed on steps needed to improve range condition. The publication does not dwell on the past, but looks forward to a future of improved resource management in cooperation with the residents of the area.

The only significant change which I would suggest in future Management Framework Plans and EIS's would be in the method of describing the difference between the estimated forage production based on the BLM's inventory and the active grazing qualifications (or present licensed use). In this Draft EIS and all others reviewed to date, any difference is described as a required reduction or increase (adjustment) in licensed grazing use which comes across as an implied threat to licensees. A one-time inventory is merely an estimate of grazing capacity at that time. Only by evaluating actual use under specific management schemes, affecting utilization and trend studies over a period of three to five or more years, can reasonably accurate grazing capacities be developed.

6

Therefore, the statement, "the total active grazing preference would be reduced from 113,122 AUMs to 78,336 AUMs (31 percent)" would be more effectively stated as follows:

> Based upon a vegetation inventory conducted in 1976 and 1977, there is an estimated deficiency in available livestock forage of 34,786 AUMs (31 percent) from the total active grazing preference of 113,122 AUMs.
>
> The proposed action and the various alternatives describe the management activities available to restore this calculated deficiency and to attain a realistic measure of the productive potential of the ranges (146,757 AUMs) within twenty years.

It is not a BLM policy or objective to remove or reduce livestock from the ranges. The objective is to improve and enhance the ranges for all uses. In order to accomplish that task most effectively and rapidly, the cooperation of livestock operators is essential. The recommended change in style would remove one of the most formidable barriers which often exists between the BLM and livestock operators who operate within a given EIS area.

I fully support Alternative No. 6, The Cooperative, Multiple-Use Alternative, which was developed cooperatively by the Owyhee Cattlemens' Association Action Committee and the Owyhee Resource Area Staff, Bureau of Land Management. Alternative No. 6 differs from the Proposed Action only in the method of implementation. It emphasizes a cooperative, coordinated approach to range management which fully recognizes the importance of private participation as well as participation from federal, state and local agencies and various user and interest groups and individuals. The coordinated effort suggests the inclusion, on a voluntary basis, of private and state lands in range management programs.

A key part of the Cooperative, Multiple-Use Alternative is the immediate implementation of voluntary and innovative interim management programs and practices designed to improve range trends and to meet the physiological requirements of key range plants up to three years before decisions by BLM might be implemented. The cooperation of permittees and range management professionals from BLM, the Soil Conservation Service, Idaho Department of Lands, Idaho Department of Fish and Game and the University of Idaho will insure the soundess of the interim practices. Experience to date indicates potential for a rapid improvement in range condition with a much reduced economic threat to livestock operations.

I am pleased to have had the opportunity to work with the Owyhee Resource Area Staff, Oscar Anderson, Ted Milesnick and Glen Secrist, and the Owyhee Cattlemens' Association Action Committee cochaired by Dick Bass and Mike Hanley. Their demonstrated spirit of cooperation and

6

good faith has established an example of cooperative resource management which should become the goal of all future BLM Land Use Planning and Environmental Impact Statement programs.

My detailed comments are attached.

Sincerely,

DAVID P. TIDWELL
Rangeland Resource Coordinator

dpt/dc
Enclosure (1)

6

Comments on

THE OWYHEE GRAZING ENVIRONMENTAL IMPACT STATEMENT

by
David P. Tidwell
Rangeland Resources Coordinator
University of Idaho

The following comments are offered in a constructive voice to hopefully strengthen the Bureau of Land Management's range management program in the Owyhee Resource Area, Idaho.

Page i, Summary: First Paragraph

It states the purpose of the proposal is to improve soil vegetation, watershed, wildlife and other resource conditions, and to provide adequate forage to stabilize the local livestock industry.

I suggest that the word "strengthen" be sobstitoted for "stabilize".

Page i, Last Paragraph, Sentence No. 6

Should be amended to include "range users". The sentence should read: The BLM would assist the range users, state Land Department and Soil Conservation Service in developing grazing systems. An additional sentence should be added to the last paragraph which would state: The Bureau of Land Management would cooperate in the development of grazing systems in the areas in which BLM is a minority land holder.

Page ii, Paragraph 1:

The Bureau is to be complemented on the aggressive range improvement program under proposal.

Paragraph 2, under the Proposed Action

The goal of 146,757 livestock AUM's is encouraging.

Paragraph 6

6.1 Does this paragraph indicate that the purpose of reducing livestock numbers is to benefit wild horses?

Wild horse numbers should be reduced to target levels and, therefore, would be more compatible with the overall management of the resources in the area. It would appear that wild horse numbers should be reduced before livestock numbers. There would be no economic impact on the removal of those horses.

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Last Paragraph, Page ii and First Paragraph, Page iii

6.2 Indicates hunting and fishing use would increase by 20,400 activity occasions above the current trend levels. In view of current energy trends, those figures appear somewhat optimistic.

Paragraph 3, Page iii

It would seem appropriate that the BLM would use processes and procedures which would minimize the adverse impact on the 21 operators who might have difficolty remaining in business due to livestock reductions.

Paragraph 5, Page iii

6.3 Alternative No. 1: It states that downward trending areas would stabilize, static areas would exhibit upward trends, and areas in fair, good econological condition with upward trends would improve one condition class.

These are unsupportable statements. Without the livestock operations to carry out management and the livestock themselves to be utilized as a management tool the statement that static areas would exhibit upward trends is not necessarily true. Box, 1978, states that there are large acreages of non-productive rangelands throughout the west which have shown and will not show appreciable improvement without treatment. And the assumption that non-use of the land would improve all range sites is incorrect.

Page IV

6.4 There are a number of statements referring to areas currently exhibiting upward trends, areas where trend is static and further declining and areas exhibiting downward trends. Previous questions of Bureau of Land Management personnel indicate that only one year's vegetative inventory was used to determine the data in this document. According to virtually all range texts and range management experts, a trend cannot be determined on the basis of one observation. And, trend in general cannot be determined without monitoring over at least a three to five year period. Therefore the statements on trend should be amended as they were in the Shoshone EIS to the more accurate term "apparent trend". BLM personnel have indicated that no monitoring plots have been established to date. Until these monitoring plots are established and monitored over a period of three to five years, no reliable trend information is available and, therefore, management decisions based on trend cannot be made. It is recommended that trend plots be established and monitoring commenced immediately so that accurate trend information will be available as early as possible.

Page IV, Paragraph 6

6.5 States that livestock would continue to impact 63 known cultural resource sites. Does this indicate that wild horses and wildlife would not impact those sites?

Page V, Paragraph 2

6.6 Goal of alternative 3 is to maximize wildlife and watershed conditions. To allow wild horses to increase to 338 head and to reduce livestock use by 50% does not automatically mean that wildlife numbers would improve.

Page VI, Alternative 4, Paragraph 2

6.7 The statement that riparian zone vegetation would show little improvement with most areas expected to be in poor or fair condition in 20 years is an assumption that is difficult to support. Allotment Management Plans designed to improve riparian zone vegetation under intensive grazing systems, should result in a more rapid improvement in riparian habitat than is indicated in paragraph 2. Research in Utah by the U. S. Forest Service indicates that riparian habitat in many situations can be improved without fencing. It is questionable whether the expense of fencing riparian habitat is justified if properly planned management systems are undertaken.

Page 1-2 under Purpose and Need, Paragraph 3

Points out that Alternative No. 5 was developed with input from the Owyhee Cattlemens' Action Group. It appears an effort by the Owyhee Resource Area Staff has been made to incorporate the wishes of the Owyhee County Action Committee. This is commendable. In hastily reviewing Alternative No. 5, a number of changes in that Alternative could make it more acceptable to both the Bureau of Land Management and the livestock operators. Specifically, it was mentioned in Alternative 5 that because of no decrease in livestock use, utilization of key species would remain at 70 to 75%. This would result in the failure of grazing systems in about 40 allotments, totaling 273,860 acres. It appears that through utilization of cooperative management agreements, many of these obstacles which could result in failure of Allotment Management Plans might be overcome. Most ranchers in the Owyhee Cattlemens' Association, who have been contacted, express an interest in voluntarily adjusting numbers as necessary to insure the success of land treatments and grazing systems. If such agreements could be made on an individual basis, it appears that the ratio of success to failure on grazing systems would be greatly increased. The Owyhee County Cattlemens' Association Action Committee has designated a subcommittee to work with the Bureau of Land Management, Boise District, to develop a satisfactory alternative for inclusion in the final draft which would be basically acceptable to both the livestock operators and the Bureau of Land Management. On the surface Alternative No. 5 in its present form does not adequately meet the multiple-use needs of the resources which is not the desire of the Owyhee Cattlemens' Association. It is the opinion of that group that multiple-use requirements can be met through a cooperative and coordinated approach to management which adequately considers the multiple-use values of each allotment.

Page 2-1, Chapter 2, under Objectives

I support the objectives as outlined on page 2-1 and 2-2.

Page 2-4, First Paragraph, Items 1 and 2

Policy for allocating additional forage which may become available is commended. It is felt that the method of allocating additional forage is extremely fair to the livestock operators.

Page 2-4, Paragraph 4 and 5

The fact that grazing systems that are implemented in less intensive management areas would be allowed utilization levels of up to 50% rather than being based on biological limits of forage species would appear to be an incentive to the coordinated management approach currently under way by a number of operators. Coordinated management should be encouraged under all levels of management.

Page 2-4 and 2-5, Implementation of Livestock Adjustments

With certain degrees of flexibility this schedule might be utilized. There is another system currently under study by the Bureau of Land Management which may be preferred. This is called the Zimmerman Approach, which was developed in New Mexico. It allows up to one year for the Bureau and livestock operators and other interests to cooperatively work out a schedule for implementing decisions and developing coordinated Allotment Management Plans. Secondly, it would allow up to five years to implement any reductions in livestock use that are felt to be needed. It would also allow for an initial reduction which would include voluntary non-use by the permittee to insure vegetation response from management efforts and permit prudent investments in supporting range improvement. The five-year time frame would allow time for the collection of monitoring data as well as to allow livestock operators some latitude in making adjustments in livestock numbers and not force them to market at inappropriate times. Thirdly, it would immediately establish cooperative monitoring studies as needed in order to determine actual use, utilization of key vegetation species and trend in range condition. Fourth, it would establish a check point at the end of three years, at which time the monitoring studies would be evaluated and further adjustment for all multiple uses made. Fifth, it would continue the monitoring and at the end of five years, evaluate again and apply any needed adjustments. Sixth, it would require for the managers and the permittees, to jointly make judgments in applying this approach and have the capability to take immediate action in those instances where serious resource damage is occurring and where delays in reducing livestock numbers would cause irreparable harm. The system being used in Shoshone District, and also in Challis, would would allow for a 10% reduction immediately and then any other voluntary reductions that may be appropriate could be made by the permittee. The BLM would make commitments to the development of cooperative management and monitoring programs and the necessary treatments which might be approriate to increase the forage production at the maximum possible rate.

Page 2-6 and 2-7 under Livestock Grazing Management

It is requested that as a means of improving range condition in the most timely manner that interim grazing systems or modifications

of management be initiated at the earliest possible opportunity so that ranges would not have to wait until heavy investments of funds are made before improvement in range condition can commence. The Owyhee Cattlemen would would like to cooperatively initiate whatever interim grazing systems and techniques for improving range condition can be mutually agreed to. At the same time, the permittees agree that intensive management systems should be implemented wherever necessary.

Page 2-8 and 2-9, Fencing of Riparian Habitat

While the importance of improving riparian habitat condition is recognized, it is questionable, based on existing research, that the expense necessary to fence stream banks in order to protect them from livestock use justifies the benefits derived. It is therefore recommended that intensive management systems be developed which fully recognize the need for stream bank protection. If, after monitoring of range conditions over a period of time, riparian habitat has not been adequately protected and improved, then fencing could be considered. In view of the extreme costs and management constraints which result from stream bank fencing, it would appear prudent to give this type of proposal a rather thorough review. Experiences show properly designed intensive grazing systems will result in considerable improvement of most riparian habitat types. It appears only reasonable that these less expensive methods should be given an opportunity.

Page 2-9, Last Paragraph, Fencing Sagegrouse Brood Habitat

6.8 Again, this is an extremely costly program with limited or doubtful benefits. Unless meadows were of large enough size to provide a separate grazing unit, fencing such meadows would create more, rather than fewer, management problems. The benefits to sagegrouse would be short-lived if there were to be any at all. Without livestock grazing on these areas to promote re-growth of tender green vegetation, sagegrouse would be adversely affected. It is doubtful that fencing such meadows would be of as much benefit as a well designed intensive management system.

Page 2-10, Paragraph 5, Add Final Sentence

"Improvement maintenance responsibilities will be specifically assigned in the Allotment Management Plan (AMP)".

Page 2-12, Land Treatments

6.9 It is recommended that the Boise District BLM prepare a maintenance burning schedule, particularly for juniper sites. Because of the lack of understory, it will be extremely difficult to obtain effective burns on juniper stands. An initial burn would improve vegetation on a relatively small area, and would only encroach a short distance into the heavier stands of juniper. Following each burning treatment, additional understory would develop. It is anticipated that as many as five or more burns in relatively short sequence would be required

6.9 to adequately achieve desired results. Additional maintenance burns on the average of every five to ten years would be required in many cases. The Owyhee permittees would be interested in working cooperatively with the Bureau of Land Management in a coordinated juniper control program which would include mechanical, chemical and fire treatment of this very aggressive invader. Many thousands of acres in the Owyhee Resource Area, which presently supports stands of juniper, cannot produce forage until some successful treatment has been carried out. It is important that juniper control be given a very high priority in the land treatment program.

Page 2-12, Add Second Paragraph Under Land Treatments

"Range seedings will be conducted on sites in poor or fair range condition with favorable soil and precipitation conditions. Primary objectives of range seedings will be to reduce livestock impacts on areas important to wildlife and to extend the spring grazing season so as to enter summer ranges at later stages of plant development".

Page 2-13, Restriction

Item No. 2 - No spraying or chaining would be done in Class I or Class II Visual Resource Management Areas, or in areas under Wilderness Review. This restriction could be extremely harful to the potential development of a number of areas heavily invaded by juniper. These restrictions should be modified if possible so that some preparation could be made in areas where the juniper is at a stage which will not carry fire at the present time.

Item No. 3 - Prohibition of sagebrush spraying on deer summer ranges or sagegrouse brood or nesting areas is too harsh. Spot sprays on productive sites that have overly dense sagebrush should be planned. Recent meetings with Don Klebenow of the University of Nevada, has indicated that such treatment may not be detrimental to sagegrouse or deer.

Page 2-13, Restrictions, No. 3

Add--"without assurance that little negative impact on wildlife would occur".

General comment on restrictions on land treatments:

While most restrictions have some practical application, there are many sites and circumstances which would require exceptions to these restrictions. It is recommended that they be used as guidelines with the ultimate authority for management resting with the Area or District Manager.

Page 2-14, Paragraph 1

6.10 The statement is made, "By cooperative agreement, approval or concurrence would be obtained from the Idaho Department of Fish and Game prior to application of any chemicals". Does this statement mean that the Idaho Department of Fish and Game has absolute veto

6.10 authority over any applications of chemicals on public land? If so, it appears that the Bureau of Land Management has abrogated its authority to another agency.

Page 2-14, Paragraphs 3 and 4

Suggest addition of the word "average" before sagebrush canopy in both paragraphs.

Page 2-14, Paragraph 8

Total prohibition of spraying within one-fourth mile of riparian areas is arbitrary and needlessly restrictive. Small, irregular treatments much closer to riparian areas might be desirable. Blanket policies of this nature should be eliminated in favor of on-the-ground decisions by qualified persons familiar with the specific site.

Page 2-15, No. 4

The sentence, "Close coordination with the State Historic Preservation Office would be maintained in such areas", should be added.

Page 2-16, Paragraph 6, First Sentence

The word "regular" should be inserted between require and motorized.

Page 2-17, Monitoring Programs

Although the first paragraph indicates that the study site would be selected and read cooperatively with livestock operators and other interested agencies and organizations, it appears that this needs to go a little further. It will be impossible for the Bureau of Land Management to procure enough personnel to adequately monitor all monitoring sites. Therefore, it's essential that wherever technically possible, permittees, other agencies and other interests should be encouraged, trained and given assignments for monitoring responsibilities. This program will not only provide better monitoring information, but will also promote cooperation toward total management objectives.

Page 2-17, Monitoring Programs, Paragraph 1, First Sentence

Add, "in cooperation with range users", following Section 4412.

Paragraph 2 and 3 under Utilization Studies

A similar program for determining utilization should be initiated. While the responsibility rests in BLM, it would be a saving in tax dollars if utilization studies were carried out in a cooperative manner. Perhaps certain areas could be assigned to different teams which would involve other agencies and groups and livestock operators, as well as Bureau of Land Management personnel.

Page 2-17, Last Paragraph, Implementation Schedule

It is recommended that the adjustments in livestock use be implemented over a five-year period, rather than over a three-year period.

This is consistent with our recommendations for implementation of the Zimmerman Approach to Decision Making. In view of the time schedules for various land treatments, it would appear that commitments by livestock operators and other interested groups should be matched by firm commitment by the Bureau of Land Management for range improvements. At the same time, livestock operators should be encouraged to invest private funds into the development of rangelands. Since the Bureau of Land Management cannot be assured far in advance of the availability of funds, the more project work that may be carried out through the use of private, state and local funds, the higher the probability of success of the program. It is recommended that all interested groups be contacted to determine their capability for contributing funds, machinery and labor for improvement projects. The willingness of the various interests to participate should play a part in establishing priorities for range improvements.

Page 2-18, Paragraph 3

Add word "cooperative" before monitoring programs.

Pages 2-19, 2-20, 2-21

Alternatives 1, 2 and 3 appear to be undesirable or impractical.

Page 2-24

Alternative No. 4, 60 Percent Utilization, has a number of features which provide greater flexibility in management of livestock. It is recommended that the Owyhee Cattlemens' Association and the Bureau of Land Management jointly develop an alternative number 6, which incorporates the better parts of the proposed action, the alternative number 4 and alternative number 5, which meet jointly arrived at management objectives. This proposal should include the desirable portions of the Zimmerman Approach, the principles of cooperative monitoring and utilization determination, the opportunity for private investment in range improvements on federal lands and the use of voluntary non-use by permittees as an alternative to suspended non-use by the Bureau of Land Management. Such proposals would be developed under a cooperative process into a signed written agreement. In addition to the usual binding restrictions on the permittee, failure of the Bureau of Land Management to perform any of its commitments would be subject to the normal appeals process. All Allotment Management Plans would be developed under the multiple-use concept.

Page 2-32, Paragraph 1, Sentence 6

Add the word "coordinated" after A and before cooperative or integrated....

Page 3-2, Last Paragraph

Additional sentence: "Cooperative monitoring of range condition and trend will continue throughout the Allotment Management Planning and development process".

Page 3-3, Table 3-1, Average Plant Grazing Readiness Dates by Elevation

6.11 At the 4,000 foot level, all species listed have a later date of range readiness than at the 5,000 or 6,000 foot elevations. Could this be an error? It appears inconsistent that the range readiness at the 6,000 foot elevation for all species would be earlier than that for the same species at the 4,000 foot elevation level. Table 3-2 on page 3-3 appears to be more consistent.

Pages 3-4 and 3-5, Condition Classes

It is recommended that in the development of Allotment Management Plans the desirable stage of ecological plant succession, which is most beneficial to the birds and animals which use that allotment should be identified as a target condition class. To do so would avoid misunderstandings and will establish more accurate goals. Failure to do so could result in over-expectations by persons or organizations lacking the necessary understanding of allotment needs.

Page 3-6, Paragraph 4, Musgrave Soil Loss Equation

6.12 Cook, in 1979, states that the Musgrave Equation is inaccurate on most range sites and types. It is recognized that some system for estimating soil loss is necessary. It is therefore recommended that the figures obtained through the Musgrave Equation be recognized as having definite limitations and should not be used at face value. Available information from the Reynolds Creek Experimental Station should provide the Owyhee Resource Area with higher quality hydrological information than most other environmental impact studies.

Page 3-11, Table 3-4, Existing Mule Deer Seasonal Food Habits as Compared with the Optimum Mule Deer Diet

It is obvious that there is a serious deficiency of forbs available on the Owyhee Resource Area. Forbs provide the diversity and high protein requirements for all grazing species. It would be desirable to include forbs such as alfalfa and other legumes in all seeding mixtures where there is a chance of survival. Antelope and sagegrouse also propser under conditions where ample forbs are available, particularly late in the summer. A study in the Sheldon-Hart Mountain Antelope Refuge in Oregon and Nevada determined a strong correlation between the existence of late season forbs and the survival of antelope kids and sagegrouse chicks. Introduction of perennial forbs and the development of additional water sources for livestock and wildlife throughout the ORA would be beneficial to all grazing animals and wildlife.

Pages 3-16, 3-17 and 3-18, Aquatic Wildlife and Fisheries Habitat Condition

6.13 Points out the need for intensive grazing management systems which would provide needed rest and deferment for aquatic habitat. It is inappropriate, however, to compare present actual livestock use with that proposed under intensive management systems. Intensive systems are

designed to disperse livestock grazing use and to provide the necessary rest which will allow riparian habitat the necessary opportunity to grow and prosper. Cost-efficient techniques should be tried and evaluated before implementing more costly, complex practices.

Pages 4-2 through 4-11, Impacts to Vegetation

This section is very well done. It is soundly analyzed in a tone that encourages actions which will enhance resource values.

Page 4-10, Range Improvements

6.14 To this point in the Environmental Impact Statement, no discussion has been made of the spin-off benefits of range improvement measures. Godfrey, 1979, indicates that as a result of seedings and brush treatment practices, untreated areas in the vicinity will show significant improvement in plant vigor and production in approximately four years following the development of treatable areas. It is known that increased production in seedings and areas where brush treatment has taken place reduces grazing pressure on surrounding slopes, therefore enhancing those areas through the process of release. This is one of the major benefits of range seeding, chemical control and prescribed burning when followed by intensive grazing management. Improvement through range rehabilitation in lower elevation areas allows for later use of higher elevations. This results in dramatic improvement of higher elevations.

Page 4-18 and 4-19, Water Availability

6.15 An additional paragraph may be desirable which would describe the increase in available stream flow and spring flow which results from the reduction of transpiration losses resulting from brush and juniper control practices. Experience in many areas indicates a significant increase in spring and stream flow following brush control measures.

Table 4-8 on Page 4-21 - Vegetation Treatments

6.16 Under remarks the statement should be included which points out that the increased productivity of these lands for livestock grazing will reduce the utilization of adjacent native ranges, therefore improving its condition and making more forage available for wildlife. 6.17 In addition, the diversity of species planted in the seedings will benefit wildlife as well as livestock. Observation of many seeded areas, including seedings of crested wheatgrass alone, indicate heavy spring wildlife use in most instances. Seedings produce a source of forage for wildlife which should not be overlooked.

Page 4-44, Livestock Grazing, Paragraph 4

The concern for insufficient additional pasturage available to operators to make needed adjustments to establish range seedings is appreciated. It is important that funds from the Agricultural Conservation and Stabilization Service be made available to allow ranchers to develop additional forage on private and state lands to compensate for this. Most ranchers are willing to make some sacrifices in order to allow seedings and other land treatments the opportunity to become established. It is essential that the planning of all range improvement projects be very carefully coordinated with livestock operators and supporting agencies such as the Soil Conservation Service and ASCS to allow for the development of additional forage or to insure that the livestock operator has been able to acquire the means to maintain his operation. Every opportunity to avoid the necessity for livestock operators to reduce herd size should be made.

Page 4-44 through 4-52, Chapter on Livestock Grazing

This is the best analysis of the impacts of a proposed action on livestock grazing that I have reviewed to date. A genuine effort to identify the economic impacts on the livestock operations and the concerns of the local community is demonstrated. Fully recognizing that different economists will develop different figures, the figures in the Environmental Impact Statement are very impressive and a definite effort to be as honest as possible is very apparent.

Page 5-54, Alternative 1 Analysis, Paragraph 1, 2 and 3

This is an excellent analysis of what could be expected to occur under this alternative. Particular emphasis should be placed on paragraph 3 which points out that the improvement of ranges in poor condition exhibiting downward trends would be extremely slow if any recovery at all would occur because of the absence of livestock for use as a management tool.

General Comments for Alternative 1, Pages 4-53 through 4-69

It is felt the writers of this EIS did an outstanding job of pointing out the positive and negative aspects of this alternative as clearly and as accurately and as objectively as possible.

Alternative No. 2, Pages 4-70 through 4-79

The same comments apply to alternative number 2. The Owyhee Cattlemens' Association recognizes the serious need for an aggressive range improvement and management program in Owyhee County. It also recognizes that these improvements cannot occur without some changes being necessitated in the various allotments. The primary concern of this organization is to insure that these changes are made as compatibly as possible with existing livestock operations in a manner that fully considers the need for a cooperative effort which recognizes the importance of the federal ranges to the stability of each individual livestock operation. I support that position.

Alternative No. 3, Pages 4-80 through 4-97

The analysis of impacts for this alternative is well done. We agree with the authors that the economic impact of this alternative would be more severe than either the proposed action, alternative number 4, or alternative number 5, but that the environmental impacts would be less severe than in alternative number 2.

Alternative No. 4, Pages 4-98 through 4-114

Alternative No. 4 provides for certain flexibility of management which is not discussed in the proposed action. In certain situations desired results may be obtained under a grazing management program which allows for a higher utilization as suggested in Alternative No. 4. There are many aspects of this alternative which might be worthy of consideration when the final decision is to be made for the Owyhee Resource Area. It is suggested that processes under consideration in the proposed action, Alternative No. 4, and Alternative No. 5, and to some degree Alternative No. 3, be given full consideration on an allotment by allotment basis in the final decision-making process. Alternative No. 4 may be appropriate to a number of the allotments in the Owyhee Resource Area and should be fully considered.

Alternative No. 5, Pages 4-115 through 4-131

Alternative No. 5 is apparently an effort by the authors to give full consideration to development of the ranges for the purpose of livestock grazing only. While the Owyhee Cattlemens' Association appreciates this consideration, we hasten to remind you that we do support the multiple-use concept of public land managment and feel strongly that any management decision emerging from the Environmental Impact Statement process must be a multiple-use decision. The Owyhee Cattlemens' Association has worked diligently for many years toward a multiple-use approach to public land management. We do not now want to compromise those values. Therefore, it is proposed that range treatment projects would be designed to fully consider multiple-use values. We also urge that interests, other than livestock be involved in the planning of all management and improvement projects. We also recommend that the Bureau consider us as a partner in any development program. We are prepared to the limit of our resources to participate actively and financially in the planning, development and maintenance of any management and improvement projects. We would also encourage any wildlife groups, sportsmen's groups, the Owyhee County Historical Society, off-road vehicle groups, backpackers and any other interested parties to participate with us and the Bureau in the development of these rangelands to the maximum potential for all resources. Whereever possible, we would prefer to utilize voluntary non-use if necessary to accomplish resource management objectives rather than suspended non-use as imposed by the Bureau. The impact to the resources may be the same, however, we feel that a true cooperative effort is necessary for the success of any range improvement programs. A close working relationship with the Bureau will provide for adequate communication to insure full informational interchange between the Bureau, the ranchers and other interested parties.

Our objectives are basically the same. We firmly believe that if we may work cooperatively with the Bureau and other interest groups, the results will come more quickly and be more lasting and beneficial to all the resources as well as the economy and society of the Owyhee Resource Area.

General Comment

The Owyhee Cattlemens' Association sincerely desires to work closely with the Boise District, Bureau of Land Management in the development of Allotment Management Plans which will result in the most rapid improvement of all rangeland resources possible. We are fully prepared to invest our time and money in the development of these ranges. In return we would appreciate a commitment from the Bureau of Land Management to also invest in these rangelands to the limit of their capabilities and to fully consider the financial and social needs of individual livestock operators so that the strategies to reach the resource objectives create as little adverse impact as possible. It is also recommended that priorities for range improvement be made on the basis of the willingness of the permittees to participate in cooperative management and that projects be implemented first if possible on those allotments which demonstrate the greatest need for management and improvement. We also recommend that a process similar to the Zimmerman Approach for Decision Making be used in the Owyhee Resource Area. The Owyhee Cattlemens' Association will do all within its power to encourage its memebers, as well as non-members who are permittees, to cooperate to their utmost in the development of range management and improvement programs.

There is perhaps a need for more study into the social impacts of the various alternatives as well as the economic impacts. As mentioned earlier, different figures would be developed by almost any individual who would work on the economic impacts or the social impacts for that matter. Dr. Neil Rimbey, of the College of Agriculture, University of Idaho, is preparing an economic study which may be used in the final draft. Hopefully, this economic study will be available in the very near future. Dr. Rimbey plans to reveiw his economic study with the Owyhee Resource Area Action Committee before releasing it to the Bureau or to the public. If his study is approved, it is hopeful that we will be able to recommend to the Bureau of Land Management that it he accepted for inclusion in the final draft of the Environmental Impact Statement. With no undue respect to the economists who performed the economic study for BLM, we are hopeful that Dr. Rimbey's study will provide a more complete economic analysis of the impacts of the various alternatives than the Bureau was able to develop themselves. If that is not the case, then we, of course, would not recommend acceptance of Dr. Rimbey's study by the BLM.

Response to Letter No. 6

Letter number 6 contains several observations that do not deal with the adequacy of the Draft EIS and are therefore not responded to individually. The statements in this letter suggesting changes in the proposed action or alternatives have been considered in the formulation of Alternative 6, one of two new alternatives analyzed in the Final EIS. See the Consultation and Coordination section of the Final EIS for details of the evolution of the two new alternatives.

6.1 Wild horses would benefit from increased forage availability. Reductions of wild horses and livestock are proposed to balance forage production with forage demand.

6.2 Estimates of future recreation use are based on projections within the 1977 Idaho Outdoor Recreation Plan. On page 4-42 of the Draft EIS, recreation use projections are qualified.

The effect of current energy trends on future recreation use may be offset by the production of more efficient vehicles. Also, users may take fewer but longer trips. Since the Owyhee area is closer to Boise than many hunting and fishing areas in Idaho, use may be transferred into the Owyhee area due to the energy crisis.

6.3 These statements are supported by the literature presented on pages 4-53 and 4-54 of the Draft EIS. While livestock interaction at proper stocking levels would improve range faster, removal of livestock does not eliminate grazing by horses or wildlife. Identical animal-plant interaction occurs with these grazing species even though at less intensive rates.

6.4 The term "trend" is properly used throughout the Draft and Final EIS. See response 2.7 for additional clarification.

6.5 All ongoing grazing use would continue to impact sites. This has been corrected in the Final EIS summary.

6.6 This alternative was designed to maximize wildlife habitat conditions. It was not necessarily designed to maximize wildlife numbers.

Increased productivity (number of young/adult) is expected due to improved forage and cover. Since populations of game species would be managed at levels similar to the proposed action, there would be a greater harvest potential.

6.7 Properly planned intensive management systems designed with special consideration of riparian areas may improve. Along with the types of grazing systems proposed and the seasons-of-use many other factors were considered for impact analysis of the riparian areas. These included the present riparian condition of streams, past systems and seasons-of-use and their effectiveness, past utilization patterns of these areas, vegetative type, plant phenology, carrying capacities of the pastures, topography and the

Response to Letter No. 6 (continued)

consideration of literature pertinent to the Owyhee impact analysis (as cited in the vegetative and fisheries section of the Draft EIS). A study in Utah by the Forest Service (Diamond Fork Study) was not considered for impact analysis as to the effectiveness of a particular grazing system since this study was not properly designed to indicate the effectiveness of that system.

Fencing of streams has been proven (see literature cited in fisheries section) to be reliable and effective in improving riparian habitat condition. Until other grazing systems with consideration of many other interacting factors can be tried and proven over time, fencing remains the most reliable method for insuring riparian habitat improvement.

6.8 Fencing sage grouse brood rearing habitat is an alternative where heavy livestock grazing occurs during the critical brood-rearing season. Oakleaf (1971) found that diminished food supply of a deteriorated meadow limited associated sage grouse use. It is not anticipated that this alternative is necessary in all critical brood rearing areas. Where fencing is necessary, every consideration will be given to the management of livestock grazing in the fenced areas (see text change section for literature citation).

6.9 We agree that to effectively burn many of the juniper areas, numerous small burns will be necessary. The vegetative response on these smaller areas would be as described on pages 4-6 and 4-7. A maintenance program for treated areas will be developed to keep the desired vegetative composition.

6.10 The Draft EIS has been changed to indicate the Idaho Department of Fish and Game would be given the opportunity to review and comment on proposals for chemical treatment. The responsibility for the decision whether to undertake vegetative manipulation projects rests solely with the bureau (see text change section).

6.11 Table 3-1 was in error. See corrected table in the text change section.

6.12 The limitations of Musgrave's Soil Loss Equation are recognized and discussed in Appendix H. Musgrave's equation is used as a model to compare different management alternatives. Cover is the only factor in the equation that varied between alternatives. For this reason we did not use the end points but compared the changes in erosion rates between different management alternatives. The soil erosion rates determined using Musgrave's equation were compared to rates determined on the Reynolds Creek Experimental Station and were found to correlate very well. This indicates that predicted erosion rates are reasonably accurate.

6.13 Chapter 3 strictly deals with the present resource condition. There is no attempt to compare present livestock use with the

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Marjorie Hayes... 7440 Manorwood Drive, Boise, Idaho.

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Thenk you for the opportunity to express my point of view concerning the Owyhee Grazing Environmental Statement Draft.

Under 6 page 2-15 in chapter 2, Description of the proposed Action and Alternatives I would state: " Implementation of proposed action would cease, if the action would impair an areas suitability for preservation as wilderness"

Under the second paragraph of 6 I would change this paragraph to read: " No action which would adversly affect wilderness resources in the form of man made features on natural landscapes would be permitted in wilderness areas."

In the last paragraph on page 2-6, I would change this to read: " Construction work on range improvements would be scheduled to avoid disturbances to wild lifa and would be discontinued altogether during critical periods in their life cycle.

In my choices of alternatives I would select the following:

1. Improva vegetation to good ecological condition to benefit wildlife and fisheries habitat and aesthetic values. Maintain wilderness character of wilderness Inventory units. Exclude all known cultural sites from livestock use.

. Protect riperian habitat by prevention of overuse and let it return naturally to an improved state... Prohibit livestock use on critical deer winter ranges and whenever utlization of browse or grass shows overuse and a slight deterioration of tha range condition, with the goal in mind to improve and maintain at excellent condition by prohibiting livestock use of riparian habitat during summers and during wet soil conditions. Limit wildhorse use to 118 head. Close all early livestock ranges to recreational ORV use or any other areas where their use is showing a deterioration of the environment.

. Manage allotments with deer winter range to protect and improve wildlife habitat and maximize wildlife forage. Implement livestock grazing systems and practices that will allow dense upland and riparian cover to form on all waterfowl nesting areas. Improve fisheries habitat from poor to excellent condition by excluding livestock grazing for 5 to 7 years on riparian areas along 120 miles of stream. When the range had raturned to a satisfactory condition I would limit its usa to maintain

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Response to Letter No. 6 (continued)

proposed management systems. If the proposed system is similar to the present use and system, present use can be applied to prediction of impacts under the proposed use.

6.14 Without site specific project design criteria and specific livestock management proposals for treatment areas, it is not possible to predict vegetative responses on adjacent areas. If properly managed, the benefits indicated in the comment could occur. There is also evidence (see results from Vail project) that native ranges can suffer from the additional grazing use resulting from seedings. If seedings are managed with native range, the native range will tend to be overgrazed, especially when the seeding is considered the "key use" area.

6.15 An increase in stream and spring flow could occur from brush control. Whether an increase occurs would depend upon specific characteristics of the area where the control is practiced, the method of control used and use of the area after treatment. Burning brush will have a different hydrologic impact than spraying. Understory vegetation response to the treatment must also be considered when predicting changes in streamflow or spring flow, especially when the control area is seeded. A large increase in understory vegetation in response to the treatment may offset the reduced transpiration rates resulting from brush control.

6.16 Off-site benefits of vegetation manipulations were addressed as extensively as possible in the Draft EIS. Benefits are reflected in the portion of the analysis relating to forage allocations and vegetative condition improvements.

Native ranges bordering seedings may benefit from vegetation manipulations due to decreased grazing pressure. The extent of improvements, however, cannot be predicted since the degree of benefits depends on the season-of-use of seedings which was not specified.

6.17 Reynolds (1978) conducted research that indicated benefits to wildlife from seedings is basically restricted to big game animals, particularly mule deer and elk. His research also indicated that wildlife species diversity and abundance is very low in seedings (see text change section for literature citation).

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it at that level. Insuring that the carrying capacity of the land determines the usa.

Manage visual and cultural resources to prevent their degredation. Maintain wilderness characteristics in inventory units. Manage separation of livestock and bighorn sheep. Limit livestock concentrations in ripararian habitat. Avoid disturbance activities within 4 miles of sage grouse strutting grounds. Protect, maintain and enhance visual resource values. Manage wilderness areas to maintain their wilderness characteristics. Protect cultural resource values.

Improve on site fisheries habitat from poor to excellent condition on 113 stream miles by excluding livestock grazing for 5 to 7 years on riparian areas adjacent to the subject streams. After the exclusion period, implement intensive livestock management practicas that will maintain excellent habitat condition standards. These practices should contain combinations of the following:

(a) separate pastures for riperian areas to allow management of these pastures with emphasis on maintaining excellent habitat condition for fisheries.

(b) reduction of riperian habitat pressures by reduction of grazing on them.

(c) Use of log structures placed perpendicular to the stream and close anough together to deter use of riparian areas between the log structures... placemant of salt away from riperian areas ... provision of water for wild and domestic animals away from riparian areas. (The fencing could be achieved by cooperative effort with the Forest Service and use of logs from burned over areas. The work could be done through unemployed workers who are now jobless, due to the recession.)

I would not favor spraying, burning, chemical or seading projects, for I feel that the cura would be worse than the disease. Alternative # 3 would come closest to my selection. which would remove the cauaes of range deterioration and giva nature a chance to aid in its recovary.

I do have concern however about the impact that the loss of grazing rights will have on the amall operator. The family operated ranch may not have the means to survive this loss. Joe Blenden, in his "toward a National Food Policy" states that third world starvation is fundamentally a problem of minority control of land and production

7

supplies which leads to cash cropping and food dependency. Our own trends in America have been in this direction, with huge agri-business's increasing in number. The Washington Spectator** lists "the loss of family farms as a deadly activity going on quietly and relentlessly throughout the family farm economy... In the late 1930's there were over 6.8 million farms in the U. S., all but 2 or 3% classified as family farmers. Today the number is around 2.75 million and still dropping. Most of the decline has occurred since WW II... What has become of over 4 million family farms?"

In order to compensate to the small, family operated, rancher for his loss of grazing land due to this environmental up-grading, I would give direct government compensation. I would correlate the removal of his herds with immediate aid, in order for him to survive. I would limit this aid to only the small, family- oriented operation.

I would then encourage the small gasohol producer to cooperate in providing mash to the rancher's who are going to need to develop an alternative source of food for their livestock. In this way we could minimize the problem of the reduction in grazing allotments and help two Idaho based and owned industries to prosper.and survive.

Marjorie G. Hayes
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Boise, Idaho 83704

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* Exploratory Project For Economic Alternatives, Toward a National Food Policy, Blendon, Joe, Gregg Forts,v under summary,pp 4.

** Washington Spectator & Between The Lines, 1978, Public Concern Foundation, Ralph E. Shrikes, president Loss of Family Farms, December 1, 1978, p 2, pp 4.

8

Owyhee Grazing Impact Statement of Adam H. Blackstock

My uncle came here in 1875, My father came in 1889. I came in 1908. My son and grandsons are also engaged in livestock operations. I served as a district advisor to the Grazing Service for more than a dozen years.

I would like to quote an excerpt from F. E. Mollins booklet, "When and If It Rains" 1938. Quote "the stockman is not a despoiler of the range. He is necessarily a conservator. It is to his interest to conserve the range, public and private; for the success of his whole enterprise depends on one thing--grass", as true today as in 1938.

One cause of today's problem was the issuance of "War Emergency Licenses" in the early 1940's, against the advice of many Advisors. These crowded many areas and have since been sold and transferred to other properties. It would be an injustice to dig up these old bones" now as many ranches have changed hands in the recent years, and new owners did not know the circumstances of their rights' history. The stockmen accepted a later turn out date in 1947, and an adjustment in numbers in early 1960's. Therefore, I urge that no cuts be made at this time. Forage production depends on soil and moisture. Soil is the limiting factor, and moisture determines the amount or forage available. The average year should be the determining factor in arriving at carrying capacity. Seasonal use and Season of use are the vital elements in range management. Fencing and water development should be made to control livestock. and provide better distribution.

Cooperation of individual or individual groups of users is necessary to achieve a sucessful management program. At least five years of cooperative management should elapse before any adjustment in numbers is made.

There is a difference between the livestock users and the other users of the Federal land. The livestock people are protective and possessive of their Acre: (allotment) The hunters, fisherman: O.R.V., Rockhounds. and others are protective and possessive of their right to use Federal land, regardless of area. This sometimes causes of abrasive situations.

8

On Wildlife: Because ranches and settlements are interspersed throughout the entire area, I oppose the introduction or planting of incompatable species of game animals or birds. That is, elk, bear, bison, etc. Due to the proximity to population centers and the easy accessibility, we should produce more deer, antelope, chukars and grouse, to supply hunting for more people.

On the question of "wild horses"; I am amazed at the stupidity of Congress. The Wild Horse and Burro act was passed without a single voice being raised to consider the biologic factor or to defend the free Enterprise system. GOD created the earth and all things therein, but Congress created "Wild Horses". I commend the B. L. M. for making the situation livable.

We favor the Multiple Useconcept of management of the Federally Owned land in this Resource Area. The various uses can be made compatable with the cooperation of the people concerned. We are not in favor of single use designations, such as Wilderness or Scenic Rivers, Etc. All these ares can be managed more econically under a comprehensive use plan.

If the Federal Government retains ownership of the land, they should assume the "obligations of proprietorship" and control Noxious Weeds, Pests, and as ume their share of watershed protection in cooperation with the Local Units of Government.

We must consider that people may increase many times, but that the acres of land remain the same, therefor we should think of a permit system and seasonal use for other activities as well as for the Livestock Users.

Adam H. Blackstock
Star Rt. 5 119
Melba, Idaho

John V. Evans, *Governor*
Daniel T. Emborg, *Administrator*

State Capitol Building
Boise, Idaho 83720

DIVISION OF ECONOMIC AND COMMUNITY AFFAIRS
IDAHO STATE CLEARINGHOUSE

June 5, 1980

Ms. Michele Hudson
Bureau of Land Management
Boise District Office
230 Collins Road
Boise, ID 83702

Dear Ms. Hudson:

The Idaho State Clearinghouse distributed copies of your Owyhee Grazing Draft Environmental Impact Statement to the following agencies for their review and comment:

Idaho Department of Fish and Game
Ida-Ore Regional Planning and Development Association
Idaho Department of Agriculture

The Idaho Department of Fish and Game made extensive comments which are enclosed. We received no comments from the other agencies listed prior to the completion of this review period.

Thank you for the opportunity to assist you in the review of your Draft Environmental Impact Statement. Please send us a copy of the Final Environmental Impact Statement when it is completed. If you have any questions, please do not hesitate to call either myself or Holly Holmes at 334-3412.

Sincerely,

Gloria Mabbutt

Gloria Mabbutt, Coordinator
Idaho State Clearinghouse

GM:hh

Enclosure

IDAHO
A Land For All Seasons

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STATE OF IDAHO
DEPARTMENT OF FISH AND GAME
600 SO. WALNUT ST. — P.O. BOX 25
BOISE, IDAHO 83707

June 2, 1980

Mr. Dean Bibles
Bureau of Land Management
Owyhee Grazing EIS
Boise District Office
230 Collins Road
Boise, ID 83702

Dear Mr. Bibles:

Following our review of the draft Owyhee Grazing Environmental Impact Statement and the analysis of the five grazing alternatives presented, we have concluded that Alternative 3 (Maximize Wildlife and Watershed) would be our Department's preferred alternative. This conclusion is based on the favorable projections Alternative 3 provides in improving the ecological condition of the rangeland and the rehabilitation of the riparian-meadow areas.

9.1 In reviewing the economics between the Proposed Action and Alternative 3 the only value figures used are those related to reductions in numbers of livestock and the consequent economic impacts. No account is made of the potential economic gains provided by all resources that would be manifested through increased range improvement. If these economic gains were taken into consideration there would be little economic difference between the Proposed Action and Alternative 3.

Under the Description of the Proposed Action section we offer the following comments:

Page 2-1, Objective 3 - It is doubtful this objective can be attained. References cited on page 4-9 point out that intensive grazing systems will not improve riparian areas significantly. The problem of little or no improvement in unfenced riparian-meadow areas is also noted on page 4-22 in reference to mule deer fawning; page 4-25 in reference to sage grouse brooding areas; page 4-28 in reference to other species associated with riparian areas (270 miles not expected to improve); page 4-29, last sentence under summary of impacts on meadow-riparian habitat; and page 4-31 in reference to fisheries habitat.

EQUAL OPPORTUNITY EMPLOYER

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9.2 By treating riparian and wet meadow complexes together, a misleading picture may be presented. Many of the meadow complexes are in fair ecological condition and have the ability to improve dramatically with the proposed grazing systems. The riparian areas, however, are often in poor ecological condition and are much harder to improve. By lumping the two together, it gives the appearance of improving the riparian areas to a greater extent than is probably true. They should be dealt with separately.

Regardless of which alternative action is ultimately chosen, we recommend the amount of fencing of streams proposed in Alternative 3 (113 miles) be considered the minimum acceptable.

Page 2-2, Objective 7, California Bighorn Sheep - We recommend that BLM allocate forage for approximately 100 additional sheep to allow for expansion of the current sheep population in the East Fork Owyhee and the possibility of transplants to Red Canyon and the Middle Fork Owyhee River. Map 3-6 shows large areas of potential habitat, but no forage allocation is mentioned.

Page 2-4, paragraph 4 - Under the Proposed Action with intensive grazing management, BLM proposes to allocate vegetation based on 50 percent utilization (current year's growth). This is supposed to be measured on a pasture-by-pasture basis on transects conducted by the BLM and/or the rancher. It is important to stress the critical nature of where the transects are located in the pasture to measure 50 percent utilization of key species (see page 2-17), and that bitterbrush should be the key species read on late summer and fall transects on deer winter range areas. Also, 50 percent utilization of bitterbrush is probably too high for late summer-fall use by livestock. A 30 percent utilization rate by livestock is preferred.

Page 2-12, Land Treatments - Any land treatments should follow guidelines established for antelope and sage grouse in areas inhabited by these species. The following changes in parameters for sagebrush canopy cover are suggested:

> Sage grouse brood rearing areas - not reduced below 15 percent.

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> Sage grouse nesting and wintering areas - not reduced below 25 percent.
>
> Pronghorn (general range) - not reduced below 10 percent.

Page 4-21, Table 4-8 - This table graphically shows where the major areas of impact between livestock and deer summer and wintering areas will occur. Those pastures which are asterisked and/or underlined deserve special treatment by BLM in terms of stocking rates, season of use and intensity of monitoring the use of bitterbrush by livestock. Many of these pastures (16,400 acres total) are in poor condition and not expected to improve under the grazing systems. This is a major flaw of the proposed action.

Also, several areas of important winter range are included in the "management with private lands" concept which calls for the "biological limit" use of vegetation. This is probably impossible to monitor if the BLM lands are fenced with private land. These lands should be protected and should be fenced off from livestock use as a wildlife project. Pastures 504, 582 and 610 on the Boulder Creek deer winter range are examples.

Should there be any modifications to the Proposed Action or Alternative 3 we suggest the following be considered:

1. Land treatments should be designed to improve both livestock and wildlife forage. Established guidelines for wildlife species should be given full consideration. Based on Table 2-12 considerable improvement in vegetation classes can be achieved without expensive treatment projects (Alternative 3).
2. The number of wild horses should be maintained at a level as indicated under the Proposed Action (118-178). This reduction would provide additional forage allocation for both wildlife and livestock. We find little justification to increase these numbers to 338 head as suggested in Alternative 3.

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3. Additional protection of riparian habitat and wet meadows is a must. We find it hard to accept the emphasis on untested stream protection measures (juniper tree structures). Fencing is a proven method to protect and rehabilitate wet areas and should be used on all key riparian and meadow areas.

We appreciate the opportunity to comment on this document and request your consideration of the suggestions we have made.

Sincerely,

DEPARTMENT OF FISH AND GAME

for Robert L. Salter
Jerry M. Conley
Director

cc: Region 3
USFWS (Fisher)

Response to Letter No. 9

Letter number 9 contains several observations that do not deal with the adequacy of the Draft EIS and are therefore not responded to individually. Those statements that suggest changes in the proposed action or alternatives have been considered in the formulation of Alternative 7, one of two new alternatives analyzed in the Final EIS. See the Consultation and Coordination section of the Final EIS for details concerning the evolution of the two new alternatives.

9.1 Benefits to recreation (primarily hunting and fishing days) were discussed in the economics section of each alternative. The economic gain from recreation was $1.0 million in the proposed action versus $1.8 million in Alternative 3. The methodology to predict other economic benefits, such as soil and watershed protection, is not currently available. Some of these benefits are captured by the analysis of consumptive uses of the resource (i.e. livestock grazing, hunting and fishing).

9.2 Inventory data indicates that the present condition and vegetative species within these ecological types are similar. Their response to grazing and grazing management is also similar (see literature presented on page 4-9, Draft EIS). Because of the small area associated with these types and the similarities in vegetation and grazing impacts, these two ecological communities were included in one discussion.

10

1859
VICTOR ATIYEH
GOVERNOR

Department of Agriculture

AGRICULTURE BUILDING, 635 CAPITOL STREET N.E., SALEM, OREGON 97310

June 3, 1980

Bureau of Land Management
Owyhee Grazing EIS
Boise District Office
230 Collins Road
Boise, ID 83702

Gentlemen:

This letter is in response to requests for review of the Owyhee Grazing Environmental Impact Statement. My staff has examined the document, and I have a number of comments I would like to convey.

Only 38,000 acres of the total 1,387,224 acres are in Oregon. However, I have reason to believe that many of the licensed permittees reside in the Jordan Valley area.

The draft outlines five alternatives that BLM could use in managing the Owyhee area. I doubt that any of the five are entirely satisfactory in meeting both the biological and economic needs of the area. The first three are totally unacceptable, No. 4 is partially acceptable and No. 5, although very acceptable from my standpoint, will probably not survive the reviewing process unscathed.

I would suggest that BLM give strong consideration to a modified No. 4. Under the alternative, BLM proposed grazing systems with stocking rates based on 60% utilization in place of 50% utilization levels.

Also, BLM and local ranchers need to work together, not apart, on proposals and planning efforts such as this. Placing economic hardships on local ranchers will only widen the communication gap and make it harder for BLM to get cooperation from local residents in the future.

This proposal is unacceptable because it will drive 18-21 ranchers out of business. I need not tell you that times have been tough for those in the cattle business. Government actions, such as those proposed in No. 4, will cause further economic harm and constitute unwise planning.

I suggest that a 80-90% utilization level be implemented in place of the 60% level in No. 4. This would not drive ranchers out of business, and increase range habitat for all users. This new level should also enhance stream habitat.

10

Bureau of Land Management
Page 2
June 3, 1980

10.1 It would be helpful, I believe, if BLM looked at what improvement potentials exist on private lands. Each permittee should have a concise analysis of his current (one to three years) and long-term ability to react to AUM shortages below current licensed demand. By providing more forage on private lands, BLM could better assess what affect AUM reductions on public rangelands could have in the short and long term. Expanded cost share programs would most likely have to be increased to accomplish the above objective. I suggest such a goal be established.

In closing, I would suggest BLM seriously consider using coordinated resource management planning in all future efforts to regulate public rangelands. All users and interested parties, working together, will accomplish the most good in the shortest amount of time.

Thank you for the chance to comment on this proposal.

Sincerely,

Leonard Kunzman

Leonard Kunzman
Director
(503) 378-4152

dhL18-L19K

Response to Letter No. 10

10.1 The BLM, as a federal land managing agency, has no authority or control over private lands. Cooperative agreements between the SCS, BLM, and private landowners are planned for each allotment. These are, however, totally voluntary by the private landowners.

11

Jordan Valley, Oregon
June 3,1980

Oscar Anderson
Owyhee Area Manager
Bureau of Land Management
Boise District Office
230 Collins Road
Boise, Idaho, 83702

Re: Owyhee Grazing E.I.S

Dear sir,

I am writing in response to the Owyhee Grazing Environmental
Impact Statement which was presented for public hearings May 28,
and 29, 1980.
The study seems to be quite complete and very detailed in
every way, howeverthe accuracy of the information contained there-
in is questionable and the intensive management and allottment
management plans should be worked up in cooperation with the
permittees to obtain the best program for livestock, wildlife,
and other multiple users.
In response specifically to allottment No.0507, I live
close to and have had personal knowledge of this area for the
past 28 years and I believe that this should more then qualify
me as an expert in this area as to its condition and trend.
I disagree withthe information in the E.I.S. concerning
the condition, trend and production of grass. The forage prod-
11.1 uction is much higher, and the trend is up, and the overall
condition should be rated good.
Condition and trend should be based on the history of the
area and its potential based on soil, moisture, and grasses
available. Trend and condition should not be arrived at by
comparing this allottment with a golf course in Boise Valley.
The wildlife use in this area has been greatly reduced
11.2 due to hunterpressure in the past and not from a change in hab-
itat. The E.I.S. shows that allottment 0507 is a winter range
for mule deer, and nothing could be farther from the truth.
11.3 Deer from this area winter farther west in Oregon.
Mistakes in information of this type tend to make a per-
son question the creditability of the entire document.
The proposed livestock use on BLM ground in this allott-
ment will be reduced to161 AUMs or a 63% reduction. To put
this in perspective this would allow me to graze, on a six
month basis, 27 cows on 1,932 acres, or a little over three
11.4 sections. To break this down further, this would be 9 cows
for each square mile. this is so far from the actual carry-
ing capacity of this area that it again makes one question
the information in this document.
The proposed improvements for allottment 0507 shows
brush control and brush control and seeding. I will agree
11.5 the north 1/3 of the allottment is brush covered and could
benefit from brush control, but the south 2/3 is relatively

11

11.5 free of brush and yet brush control is proposed. I must ask the
BLM where do you get your information? Definitely not from the
area in question.
During the testimony in May the Owyhee County Cattlemen
Association presented Alternative No. 6 for your consideration.
I would like to go on record as being opposed to this alter-
native. I will not go into great detail at this time as to my
objections, it is enough to say that in my opinion if the cattle-
men had the proper time to study Alternative No.6 the majority
would not have endorsed it.
I thank you for this opportunity to respond and I will be
very happy to work with the BLM personal to work up a manage-
ment plan for allottment 0507. Just call me, my phone number
is 503-586-2255.

Yours truly,

Richard S. Bennett

Response to Letter No. 11

11.1 The vegetation inventory was conducted in 1977 and 1978 and followed established BLM inventory procedures. The vegetation production, condition, and trend data used to develop the Owyhee land use plan is the best available to the BLM. The management based on this data would be adjusted as found appropriate through the monitoring program described on page 2-17 of the Draft EIS.

11.2 We recognize that wildlife abundance, particularly mule deer, might have been influenced by hunter pressure. However, wildlife habitat conditions in this allotment (0507) are predominantly in poor condition (Appendix Table F-4, Draft EIS). With the habitat in good condition, more forage and cover would be available and higher productivity for the wildlife populations would be expected.

11.3 Mule deer ranges were identified as summer and winter ranges. Summer ranges indicate use from June through December. Winter ranges specify use from January through May. Mule deer migrating from winter ranges in Oregon to summer ranges in Idaho would pass through allotment 0507 during the winter. Distributional information was obtained from Region III of the Idaho Fish and Game.

11.4 See Response 11.1

11.5 Map 2-3, Draft EIS, shows general treatable areas and does not indicate specific acreages within an area that would be treated. The actual number of acres that are potentially treatable within each allotment are shown on Appendix Table D-1, Draft EIS. In allotment 0507, there is the potential for 342 acres of brush control and 228 acres of brush control and seeding. This totals 570 acres or 29 percent of the BLM land within the allotment. Also, onsite inspection would be required before any treatment is done. This would eliminate brush control on areas which have previously burned and do not presently require brush control.

12

June 4, 1980

Bureau of Land Management
Boise District Office
Owyhee Grazing EIS
230 Collins Road
Boise, Idaho 83702

Dear Sirs:

In response to the Owyhee Grazing EIS, we support Alternative 6, proposed by the Owyhee Cattlemen's Assoc.

Sincerely,

Wes Downs
Wendy Downs

Wes and Wendy Downs
Rt. 4 Box 4430B
Nampa, Idaho 83651

13

THE WILDLIFE SOCIETY

NATIONAL HEADQUARTERS
SUITE 611
7101 WISCONSIN AVE. N.W.
WASHINGTON, D.C. 20014

IDAHO CHAPTER
THE WILDLIFE SOCIETY

Jay F. Gore
1065B Winterhawk
Boise, Idaho
83709

June 5, 1980

Jim Gabettas
Bureau of Land Management
Boise District Office
230 Collins Road
Boise, Idaho 83702

Dear Mr. Gebettas:

Please regard this as written testimony in response to the draft Owyhee Grazing Environmental Impact Statement (DEIS).

The Idaho Chapter of The Wildlife Society is appreciative of the Bureau of Land Management's (BLM) efforts to provide for wildlife habitat under the multiple use objectives of the Federal Land Management Policy Act and believes the array of alternatives devloped relect this effort. While the interests of wildlife and therefore The Wildlife Society would be best served by Alternative #3 (Maximize wildlife and watershed), or a similar plan, we recognize that under the philosophy of multiple use, a reasonable balance of objectives must be obtained. As such, The Idaho Chapter is in general agreement with the proposed action as presented in the draft DEIS. Comments to the proposed action are enumerated below.

(1) BLM's emphasis on rangeland rehabilitation, protective management of streams and the desire to have wildlife a major benefactor of the project is proper. Permanent improvements to habitat are required.

(2) Siltation and high temperatures, problems attributed to use of riparian habitat by domestic ungulates, should be effectively controlled. 13.1 Based upon information presented in the DEIS, it is not possible to identify whether riparian areas are included within fenced areas or if other proposed control measures will effectively solve the problems.

(3) Chaining and burning of vegetation are rehabilitation tools highly disruptive to the soil. To avoid undue erosion, we suggest that these tools be used only when the potential for heavy rainfall (accelerated runoff) is low. 13.2 We prefer prescribed burning with wildlife needs in mind. The DEIS does not detail how much and where chaining and burning will occur. BLM needs to adhere to sage grouse, antelope, deer and other wildlife management guidelines when conducting these practices.

13

13.3 (4) The use of log structures to control stream trailing is ~~concern~~ common. Never-the-less, our concerns include the effectiveness of the structures, their estimated life span, maintenance requirements, and potential to create flow restrictions and passage blocks to fish.

(5) Reservoirs and springs should be managed to maintain or create downstream riparian and wet meadow values. Spring source protection is very important and strongly encouraged.

(6) Facilities should be provided, and management schemes devised, to protect the natural values of areas receiving high human foot traffic and O.R.V. use (i.e. Jump Creek).

(7) The Idaho Chapter believes the ultimate goal of the proposed action, after rehabilitation, should be management as a near self-sustaining system. Continued levels of intensive land management, which may be of benefit to the grazing of livestock, are a costly public expenditure and may be environmentally damaging.

(8) Grazing permit fees should be commensurate with the cost of improvements for livestock grazing. If not, the proposed action will amount to a public subsidy of the private sector.

(9) Important deer winter range is often used by cattle during late summer and early fall (see pp 4-20, 21, 22 and Table 4-8). Several winter range areas have grazing systems which are going to be detrimental to vegetation used by wintering deer. BLM is encouraged to reconsider use of these grazing systems on deer winter range.

(10) We emphasize that it is critically important for BLM to adequately monitor permitted livestock stocking rates and assure that extra livestock are not ranged.

The Idaho Chapter is grateful for this opportunity to provide comment to the EIS process. We trust the final document will reflect our comments and concerns.

Sincerely,

Jay Gore

Jay Gore, President
Idaho Chapter

Response to Letter No. 13

13.1 Wording has been added to clarify riparian fencing. See the text change section.

The effects of other proposed control measures are assessed in the Aquatic Wildlife section of Chapter 4 and in Appendix Table K-9 of the Draft EIS.

13.2 Map 2-3 of the Draft EIS shows generally where brush control would occur. For reasons explained on pages 2-12 and 2-13 of the Draft EIS, it is not possible now to locate exactly where each treatment would take place.

Guidelines for protecting wildlife habitat are included in the restrictions and standard operating procedures listed on pages 2-13 through 2-17 of the Draft EIS. These restrictions and procedures would be applied to land treatments.

13.3 The log structures should not block passage to fish since only the tips of the logs would be in the stream. The log structures would create cover for fish along the streambanks. These structures have been used in eastern Oregon with 97 percent of the projects resulting in marked improvement of riparian habitat. The life span of the log structures is estimated to be 25 years.

14

PRIVATE LAND CONSIDERATION

People look at the Owyhee Resource Area and think it is all public land. It must be pointed out that much of the choice areas are private land. People that homesteaded and took up these lands picked out the best lands to homestead.

The planned [illegible] recreation area of Upper Reynolds Creek, Jordan Creek and Silver City consists of a greater majority of deeded and state land than B.L.M. land. Therefore, these land owners should be consulted and given an opportunity to express their ideas concerning these planned recreation areas.

We are opposed to the inclusion of our private land into these plannedrecreation areas.

Elias Jaca, President Chipmunk
Grazing Association

Richard Gabica
Richard Gabica

14

WILDHORSES

The so-called wild mustang, about which so much eensetionelism has developed, are wild only in the sense that they are hard to catch. Their value in economic terms ie much leas than deer, antelope and elk which are controlled with senaible programe and which earn revenue for the maintenence of public land through the sale of hunting licenses. Instead of these horses helping our economy, they are alreedy on the equivalent of welfare and are being supported by the alreedy overburdened taxpayer.

The Owyhee EIS gives much mention to wild horses. In the Bleck Mountain Unit which we are very familiar with, wildhorae numbers were actuelly 17 head in 1971 growing to 30 haad in the final drafts for our basic numbers. At the present time(1980) we have over 118 head of wild horaes in the Black Mountain Unit. We were promised a horse roundup in 1979 by the B.L.M. to reduce the horses to the 1971 level, but because funds for our area were spent in other roundups our area was deleted. Now B.L.M. promises for our 1980 roundup show rumors that the funds are being depleted again. The area of use for these horses is being overgrazed and ruined by this continuence.

Persons truly interested in the preservation of our range must focus their attention on the major problam of the Black Mountain Unit of the Owyhee Resource Area--Wildhorses.

Elias Jaca, President Chipmunk
Grazing Aseociation

Richard Gabica
Richard Gabica

14

FISH AND WILDLIFE

Liveetock and Wildlife are more compatible than wildlife end people. It is a known fect that in the 1930, 1940 and 1950'e when we had the peak in livestock numbers the fish and wildlife were abundent. The bird population was feirly abundant. There is more grass on one acre now than there was on 100 acree then. The Jordan Creek, Reynolds Creek,Sucker Creek and Cow Creek areas where there were around 12,000 sheep then concentrating on these riperien areas plue cettle and horees.

We feel strongly that the decline of fisheriee and bird population came ebout with the introduction of the four wheel drive vehicle, with its gun rack and fishing gear, and people numbers. People poach the year eround.

Elias Jaca, Preaident Chipmunk
Grazing Association
Elias Jaca
Richard Cabica
Richard

14

SEASON OF USE AND AREA OF USE

Under the Multiple Use Concept there will have to ba areas of use and season of use for all multiple use.

Example One----the cattle are designated certain area for a certain time schedule.

Example Two----fiehing and hunting heve their season of use.

Example Three--off road vehicles, camping, rock hounding and etc. should have a season of use end area of use.

Example Four---off road vehicles should not be in the higher areae when the area is eoft end wet. Cattle are kept out of the high country in the epring beceuee the aree is soft and wet.

Example Five---motor cycle reces should not be scheduled in an area during a season of use for cattle.

Elias Jeca

Preeident Chipmunk Crazing
Associetion

Richard Gabice
Richard

15

Tom Collatt
Rt. B Box 265
GrandView, Idaho 83624
June 4, 1980

Bureau of Land Managament
Owyhoa Grazing E.I.S.
Boise Dist. Office
230 Collins Road
Boise, Idaho 83702

Attention: Mr. Dean Bibles
Dist. Manager

Dear Mr. Biblas;

In ragard to the Owyhaa E.I.S. I would lika to commant on a few of the proposals there in. First of all I would lika to go on racord as racommending alternative # Fiva.

I am somawhat skeptical of any of tha altarnativos or the proposal. Excapt alternativos # ona and # two as naarly all proposal to recondition the Range in tha past have not b aen accoplished. If proposals made in 1962 and 63 had baen complated vory littlo adjustment of A. U. M's would havo to ba dona now.

I have alwaya co-operated with regulations and proposals of B. L. M. I have spent considorablc tima and money daveloping water, building and maintaining fencas; but in the last 30 years hava received more than 30 % raduction os use and now thora is to ba 20 % mora.

15.1 I know that conditions on my allotmont have boen incraasing bacausa of usa of rotation, dovelopmont of water and fancing of pastures. I have been in continuous use of this Range sinco 1952 and the only continuous usor in this allotmont for more than ten consecativa years. During this timo thore has b een many B. L. M. Managers of this area, but nono of thom have stayed long enough to notice improvement.

Every new managor says," We must make a management plan." So we agree to a plan. Two or three yeara later a new managor says. "We must make a managoment plan. "So we agree to a plan, Ect. Ect. In spite of this I know conditions of this Range has improved.

15

A management plan of rotation, and fenced pastures plus Spring development is now in use and more improvement is forth coming as the last of the fences was complated only last year (1979).

I would like to propose that allotments, like this one, which has a management plan and on which the conditions are improving, should not have to take a cut in A. U. M.'s.

Of the proposed actions, the fencing and logging of creeks is of much concarn, when a cow is thirsty and knows where water is available, a fende is of little bother. So I am thinking of unnumerable trespasses which are beyond control of the Ranchare. This situation is bound to ceuse qute a lot of friction between B. L. M. and Rancers. Some adjustment for this must be considered.

The Owyhae grazing district is quite arid and vegetation is very dapendant on moisture. No matter what plans we follow, without adequate moisture no improvement can be made. But with adaquate moisture, in a very few years, without plans, much improvemant would be noted. I think the last few years have been below average rainfall, so many of our plans have been of no consequence.

I do not think thet there is adequate records of annual vegetation to warrant some of the conclusion in this study.
15.2 Also the economic conclusions are not quite realistic, because a profit fron agriculture is circulated in the local community nine to twelve times, so loss of income in livestock causes loss to tha whole economic community.

I do hope that some of the plans for allotments can be somewhat flexible as the one for my ellotment seems somewaht unrealistic.

Sincerely

Tom Collett

Response to Letter No. 15

15.1 See Response 11.1.

15.2 The multiplier used in this study was approximately 1.4. This means for every dollar generated (or lost) in the livestock industry an additional forty cents is gained (or lost) through the rest of the regional economy. Money may change hands or turn over nine to twelve times, but this does not increase income gains and losses by that much. Each time money changes hands, part of it leaks out of the regional economy to pay for items such as materials, supplies, and wages that are imported into the region. The money that leaks out does not add to the regional economy. A multiplier that exceeds two is uncommon. In fact, a report by the New Mexico State University Extension Service states, "A multiplier that exceeds two should be subjected to critical review before acceptance or use in further analysis."

COMMENTS
ON
OWYHEE GRAZING ENVIRONMENTAL IMPACT STATEMENT DRAFT

SUBMITTED BY:

Tim Lowry
Box 132
Jordan Valley, Oregon

16

INTRODUCTION

The importance of proper and balanced management of the land cannot be understated. All life is directly dependent upon the finite amount of land that we have been gifted with. For life to continue into the future, wise and careful management of all the land is imperitive. What happens on any portion of the earth, has an effect on all inhabitants. The western range lands, which includes the Owyhee Impact Statement (E.I.S.) Area, play a very important part in the life support system on this planet. This area has low precipitation and cultivation is not possible over vast areas. It is and must remain predominantly range. This range land contributes an important and indespensible link in the red meat supply. There is also a very important relationship between grazing of livestock and operation of other industries the employment opportunities offered by these industries. Many industrial centers are maintained predominantly by the livestock industry and the stability of the family livestock operations is reflected in the community stability and prosperity.

The management of these range lands must continue to be based upon the multiple-use concept. Any management policy must include provisions for maintenance and protection of the terrestrial wildlife and fish; it must consider recreational, cultural, and visual resources; and it must insure the continued use of the renewable resources through livestock grazing.

To meet these objectives, there should be a flexible and common sense application of management systems with local operator input because of the variety of conditions and needs of the different areas, allotments, and operations within the Owyhee E.I.S. Area. Only with flexibility, common sense, and local operator input can the objectives be met without eliminating many of the family operations.

It is widely recognized that it is in the national interest to preserve the family farms and ranches. The blanket application of the proposed action and of alternatives 1, 3, 4, and 6 as proposed by Owyhee Action Committee would have a detrimental effect on the need to preserve family operations.

PROPOSED ACTION

To provide needed flexibility of management, there should be a greater recognition of the viability of using a continuous grazing system. There has been adequate research to support the use of a continuous grazing system as a part of an intensive management plan.

16.1

1. Research in South Dakota showed that over a 4-year period rotation grazing compared to continuous grazing gave no advantage in steer gains or in range conditions. (Black, W.H. and V. I. Clark. Yearlong grazing of steers in the Northern Plains. U.S. Dept. Agr. Circ. 642. 1942).
2. Studies at the Northern Great Plains field station in North Dakota compared continuous grazing with a three-pasture rotation system. Yearling steers failed to gain as well under rotation grazing as in continuously grazed pastures. (Sarvis, J.T. Grazing investigations on the Northern Great Plains. N.D. agr. Expt. Sta. Bull. 308. 1941).
3. An 11-year study in southeastern Oregon involved summer grazing of beef cows under a three-pasture rotation. Continuous grazing again was found best for both cattle and vegetation. (Hyder, Donald N. and W. A. Sawyer. Rotation-deferred grazing as compared to season-long grazing on sagebrush-bunchgrass ranges in Oregon. Jour. Range Mgt. 4 (1): 30-34, 1951).

16.1

4. Eight years of data from the Southern Great Plains showed no benefit in steer gains from rotation grazing, and range improvement was so slight as not to justify the cost and labor of rotation grazing. (McIlvain, E.H., and D.A. Savage. Eight year comparisons of continuous and rotational grazing on the Southern Plains Experimental Range. Jour. Range Mgt. 4 (1): 42-47, 1951).
5. Two rotation systems were compared to continuous grazing on ranges in North Carolina and again no advantages were found to either cattle or range. (Biswell, H. H., and J.E. Foster. Is rotational grazing on native range practical? N. C. agr. Expt. Sta. Bull. 360, 1947).
6. Studies on short-grass ranges of alberta involved a 7-month grazing season concluded that conservative continuous grazing was the most practical. (Hubbard, William A. Rotational grazing studies in Western Canada. Jour. Range Mgt., 4 (1): 25-29, 1951).

In the book Range Management, 2nd edition, by Laurence A. Stoddart, Professor and Head of the Dept. of Range Management at Utah State Agricultural College, and Arthur D. Smith, Associate Professor of Range Management at Utah State Agricultural College, associate Project Leader, Federal Aid Utah State Fish and Game Dept., it is stated that "There is some doubt that the difficulty involved in following special systems of grazing is justified on open range." (p.331) and that "Although most range experiments fail to show advantages to rotation grazing, many pasture experiments and humid-climate experiments have shown distinct advantages." (p. 33).

The grazing system that would be most practicle, senseable and consistent with long term range goals for each allotment should be determined with consultation and imput from the users of each allotment. What will work for one may be detrimental to another allotment.

The vegetative allocation in the proposed action is based on 50% utilization levels of palatable plants, while alternative 4 is based on 60% utilization levels. A comparison of Talbe 4-2, page 4-6, Condition Class Summary from Grazing Management in the Proposed Action, and Table 4-35, page 4-99, Condition Class Summary From Grazing Management in Alternative #4 shows very little difference in the 20-year condition class. However, the adveree affects to family operations and local communities is significantly less in alternative #4 and the improvement to terrestrial wildlife habitat would be very similar to that in the proposed action. Due to the decreased adverse affects on family operations and the improvement provided, the 60% utilization level is a more balanced figure.

16.2 The proposal to fence 64 miles of stream and to construct log structures on stream banks will create as many problems as it is designed to solve. The proposed fences will greatly impede the utilization of surrounding areas and create unnatural pockets that will be heavily utilized and damaged. Also, the problems of maintaining these fences, as recognized in the proposal, is a serious consideration. When cattle become entrapped in these enclosures, and it will be next to impossible to prevent it, excessive damage will occur to the

16.3 reparian habitat. The log structures create the problem of log jams occuring during high water and eroding the creek banks around them. There will be places where the jams may even force the creeks to wash a new channel. In the summary of alternative #4 (p.VI), which does not include stream fencing, it states that wildlife and fisheries habitat would improve and aquatic wildlife populations would increase. Management practices that include proper numbers and distribution through measures such as salting on ridges away from streams will help protect these areas. Additional improvement could be attained by broadcasting grass seed along the creek banks. Again, fencing and building log structures are management practices that should be implemented only after on site consultation with users in the propsed areas.

The loss of 21 of the operating families as predicted by the proposed action is a situation that should not be allowed to develope. It would cause harmful consequences to the local community, the area as a whole, and to the nation.

16.4 It is stated on page 4-52 in the summary that the ranchers receiving an increase in AUMs would have more confidence and positive feelings toward government activities and decisions. I believe that this is an erroneous assumption. There will be a hardening of anti-government attitudes and feelings of helplessness when dealing with the government when we see our friends and neighbors being forced out of business. This points out the need for flexibility and common sense in designing and implementing management plans in order to meet important and vital range goals and still preserve the area's family operations.

ALTERNATIVE #1

The implementation of alt. #1 would be disastrous economically and of questionable value in improving forage and wildlife habitat. This is recognized on page 4-57, "Stoddart et. al. (1955) states 'there are instances in which total protection of the range from livestock has failed to result in the expected revival of the vegetation, presumable because of the lack of animal action in aiding reproduction.'" Also, in Nebraska, range that was ungrazed for 15 years was shown to produce less than comparable grazed range. (Weaver, J.E., and N.W. Rowland, Effects of excessive natural mulch on development, yield, and structure of native grassland, Bot. Gaz., 114 (1): 1-9, 1952).

Because of the adverse effects and limited benefits that alternative #1 would provide, it should not be considered.

ALTERNATIVE #2

16.5 In the introduction on page 4-70, the role of livestock in the deterioration of the range is discussed. The role that

16.5 the government played should also be included to present a balanced picture of the forces contributing to range decline. The role played by the government is recognized by Stoddard and Smith in their book Range Management, 2nd edition.

> "The failure of the government to determine and specify proper land use in the west has resulted in the plowing of thousands of acres of land unsuitable to cultivation. Almost every western state has tracts of plowed land now abondoned and virtually destroyed for grazing. The federal government is not alone responsible for these improper land policies; state and county government likewise made many serious errors in administration and taxation"(p.11).
>
> "The result of this general lack of supervision of public lands was an intense competition to secure as much as possible from the lands. Since one individual had as much right on the area as another, there was nothing to prevent him from placing stock on a range, even though it might already be supporting all the animals the forage justified." (p. 14)
>
> "The land laws also contributed to range deterioration, since the amount of grazing land that a person could acquire legally was insufficient to care for a herd of a size to support a family. This encouraged heavy use of the owned range and made necessary heavy grazing of public ranges in the vicinity." (p.14)

These conditions, which resulted in the major damage to the range, were not corrected until passage of the Taylor Grazing Act in 1934 which was supported and encouraged by responsible people in the livestock industry. The large majority of stockmen have recognized the need for good management of the ranges and have actively worked towards, improving them. That progress has been made, is shown by observations in chapter 3 of the draft.

> "Over all, upland watershed conditions on the majority of the allotments analyzed appear to be stable." (p. 3-8).
>
> "Herd composition data (fawn/doe ratios and per

> centage of young bucks in the harvest), hunter success, and winter range trend counts indicates that mule deer populations are increasing." (p. 3-10)
>
> "The population [Bighorn Sheep] has increased and expanded into the E.I.S. Area-----. Ewe-lamb ratios have been consistenly good; generally exceeding 60 lambs per 100 ewes." (p. 3-12)
>
> "Based upon strutting ground counts, populations [Sage Grouse] seem to be increasing in the western portion of the area and remaining stable in the eastern portion." (p. 3-13)

It should be recognized the conditions and confusion that existed before passage of the Taylor Grazing Act in 1934 were the major factors in the deterioration of the range, especially by allowing the damage inflicted by transient livestock operators. Even though improving range conditions takes time and there is progress yet to be made, the permanent, stable, and responsible livestock operators have made much progress in improving range conditions. These improved conditions have benefited all the varied interests and users of the public lands.

If this alternative is adopted, project development and land treatments should be included. This would result in additional forage and habitat improvement.

ALTERNATIVE #3

The long term gains expected from this alternative would not off-set the long term disruption that it would cause.

ALTERNATIVE #4

In this alternative, the stocking rate based on 60% utilization levels represents a more balanced approach and is more consistent with the goals of both range improvement and the need to preserve the family ranches. There should be a greater recognition of the use of a continuous grazing system

and the construction of log structures along the creeks should be deleted. The reasons for both of these suggestions are discussed in the comments on the proposed action.

Again, there would need to be a flexibility of management plans and grazing systems in order to meet the range goals and prevent the projected loss of 14 family operations.

ALTERNATIVE #5

This alternative needs to contain multiple use design features and forage allocation based on a 60% utilization level. It should also allocate forage for wildlife.

ALTERNATIVE #6

Alternative number 6, as proposed by the Owyhee Action Committee, should not be considered as written. There are 83 operators in the resource area, however, the alternative would be applicable to only a small percent of these operators. It is far too narrow in it's scope. It contains language which would lend credence to the idea of government management of private lands. Even though this is proposed to be a voluntary inclusion of private lands in the management plans, it should not be included in the alternative's language. If an individual operator wishes to include his private land that is his freedom to do so, but it sets a dangerous precedent for this practice to be officially recognized and encouraged. Too many of the management plans are related to only a few operations. An example is the proposal, also included in the proposed action, to move to the next scheduled field when the utilization in the existing field is reached. That may work when the next scheduled field is just across the fence, 16.6 but when the next scheduled field is at a higher elevation it would be irresponsible to move to it before it is ready. Does this mean that the operators faced with this situation have to bring the cattle back home until the next field is ready?

This alternative contains too many problems and is too narrow to be considered as it is presently written. Most of the comments on the proposed action apply to alternative #6.

SUMMARY

Any management plan that is finally developed must be flexible enough and broad enough in its scope to accomodate 83 different operations, problems and situations that exist in the Owyhee E.I.S. Area. To provide the needed flexibility and breadth, the plan that will be adopted should contain the following points:

1. Designed on the multiple use concept.
2. 60% utilization level of grazing.
3. Greater use of continuous grazing system.
4. No stream bank fencing or log structures.
5. Provide for project development and land treatments.
6. Allow any needed livestock reductions to be taken in voluntary non-use.

Most of these points have been discussed previously. Since these are public lands, the multiple use concept must be maintained. In the Comparative Analysis of Impacts on Page 2-28 in alternative #4 it states "60% use levels, would result in vegetative and wildlife habitat condition improvement, but at rates slower than those described for the proposed action and alternative #3." Improvements will occur with a 60% utilization level and adverse effects will be less than in the proposed action and alternatives #3 and #6. Utilization levels should be the same for intensively and less intensively managed allotments. The justification for including greater use of continuous grazing systems has been expressed previously. The problems associated with stream banks can be managed with less long term damage and problems through management practices, other than fencing and constructing log structures. Because of the increased forage and habitat improvement that would be provided, project development and land treatments should be

16

included. By allowing any needed reductions to be taken in voluntary non-use, the individual operator will have greater flexibility to economically make improvements.

If flexibility, balance, and understanding is reflected in the final environmental impact statement, the future of the important and vital livestock grazing industry and the health and vitality of the environment of the Owyhee Resource Area can be maintained. Because the B.L.M. and the livestock industry both contain people with knowledge and good will, I believe that this goal can be reached.

Response to Letter No 16

16.1 The literature citations included as support for consideration of continuous grazing systems were reviewed. With the exception of the study conducted in southeastern Oregon in 1951, all the studies cited were conducted in other geographic areas or in areas having different vegetative and climate characteristics than the EIS area. Since the 1951 study, numerous studies have been conducted that indicate the quickest and most effective means of improving range conditions and increasing livestock production is through the implementation of grazing systems. Hickey (undated) in reviewing over 100 articles on grazing management, including your literature citations, reached the same conclusions. Since Alternative 2, No Action, assesses impacts of existing continuous grazing systems, additional proposals for this system are not assessed.

16.2 The riparian fencing described on pages 2-8 and 2-9 of the Draft EIS includes water gaps for livestock and variable distance between the water and the fence. This permits fence location and design to avoid creation of unnatural pockets and entrapment of cattle.

16.3 The problem of log jams is not anticipated from log structure placement in Owyhee streams. When properly installed, the log structures have proved successful in eastern Oregon, with only three percent failing. This failure resulted from placing log structures along a stream meander. Log structures would not be placed along stream meanders in the Owyhee streams.

16.4 This assumption has been deleted. See the text change section.

16.5 We recognize range deterioration is a product of many factors. Based on vegetation inventory and the known history of the Owyhee area, we believe the statement that heavy stocking and long seasons-of-use by livestock year after year have been major factors in the deterioration of the range is accurate. We do not imply that livestock use is the only factor.

16.6 It is possible an operator would reach the specified utilization level in one pasture before the scheduled date to move into the next pasture. In this event, he would move his livestock into the next pasture ahead of schedule. In subsequent years, livestock numbers would be adjusted to conform to the scheduled dates for moving from one pasture to the next.

17

TED TRUEBLOOD
710 6TH AVENUE SO.
NAMPA, IDAHO 83651

June 6, 1980

Bureau of Land Management
Owyhee Grazing EIS
Boise District Office
230 Collins Road,
Boise, ID 83702

Gentlemen:

I have studied the Draft Owyhee Grazing Environmental Impact Statement, including the proposal and the five alternatives. I have also studied the sixth alternative, proposed by the Owyhee Cattlemen's Action Committee.

While I am heartily in accord with the goals of the proposed action, I am disturbed by the economic impact on some of the ranchers. (Pg. 4-51: "At least 21 permittees would have difficulty remaining in business.") I believe every effort should be made to avoid bringing disaster upon these people. If it takes longer to restore the range to good condition by doing so, then I think we should move more slowly.

I am displeased by the fact that more AUMs will be allocated to wild horses than to game. (Pg. 2-2.)

While I realize that the BLM is required by law to evaluate and protect possible wilderness areas, I would not like to see any designated wilderness in Owyhee County.

Restricting off-road vehicle use on spring range (Pg. 2-2, No. 11.) is desirable, but I think it should also be held to established ORV areas and confined to existing roads otherwise. During the spring thaw when many roads are "bottomless," travel should be on improved roads only except in emergency.

Last, in preparing the Final Grazing Environmental Impact Statement, I think careful consideration should be given to Alternative No. 6, proposed by the Owyhee Cattlemen's Action Committee. I have worked with some of its members for many years in an effort to improve the range for the benefit of livestock, game, fish--and people. We mutually agree that what is good for the land is good for everybody, and this alternative was prepared by dedicated men with long personal experience.

Sincerely,

Ted Trueblood

cc: Leon Church

18

THIRD DISTRICT
IDAHO WILDLIFE FEDERATION
Affiliated with the National Wildlife Federation
Counties: Washington, Valley, Payette, Gem, Canyon
Ada, Owyhee, Boise, Adams, and Elmore.
700 E. Fairview Ave. Sp 68
Meridian, ID 83642

June 7, 1980

Boise District Office
Bureau of Land Management
230 Collins Rd.
Boise, Idaho 83702

Dear Sirs:

The Third District, Idaho Wildlife Federation and the Idahoans for Public Lands jointly submit the following comments regarding the Owyhee Grazing Enviromental Impact Statement Draft. The EIS is a substantial document containing a great array of data of significance to the public and considerable impact on the future management of the public rangeland. With this in mind we offer these comments and recommendations.

We recommend a blend of Alternative 3 and the Proposed Action as the means of fulfilling the policy stated in the Federal Land Policy and Management Act of 1976(FLPMA).

1. General comments relating to the purpose and goals of the EIS.

a. Chapter 1, page 1-1, emphasis is placed on management of livestock but deals lightly with wildlife values and needs. This we feel is not consistent with paragraphs (a)(8), Section 102 FLPMA.

b. Page 2-1, Chapter 2, under objectives, item 2. This statement implies that the Bureau of Land Management(BLM) has a mandate to produce forage for livestock. Section 102, para. (a)(8) and Section 103, para. (c) FLPMA does not indicate such a policy. We feel that FLPMA policy directs management that will provide for the needs of all users of the public rangeland, therefore forage would be allocated on that basis.

c. Page 2-4, additional forage, item 1, this is also not consistent with the intent of FLPMA, Sections 102 and 103. We recognize the importance of the increased forage, but question whether the increased forage, if achieved, should automatically go to livestock. We recommend a joint review by all concerned publics prior to allocation of any increased forage. The possible and perhaps desired expansion of game populations should have equal consideration with livestock operators preference. To do otherwise would ignore FLPMA policy.

d. The ability of the Bureau to carry out the proposed action is questionable. Since there are many competing demands withing the Bureau

18

and the Department of Interior it is unlikely many of the District's projects would be fully or adequately funded. Given the Bureau's and Interior's funding procedures and policy it is doubtful all projects, developments, etc., would be weighed equally. Whatever adjustments are made will correspondingly affect the proposed action. The likely result would be the ommission of projects that benefit uses other than the traditional livestock use. This coupled with current hiring and staffing policies casts doubt on the implementation of the proposed action. There is also the reluctance of Congress to appropriate sufficient funds to achieve the proposal. Another abstacle is the Senators supporting livestock interests have imposed a limit on the reduction of livestock grazing to no more than 10%. Anything over 10% is voluntary and that action is the exception rather than the rule. This comment also applies to page 4-1, items 5 and 6.

2. Wildlife conflicts. Table 4-8, 4-9, and 4-10, intensive management, allotments with an asterick are to be reduced one condition class because of fall livestock grazing on mule deer winter range is not an acceptable condition. We recommend removal of livestock prior to September 1. This recommendation also applies to allotments 510, 544, 576, 591, 596 and 598.

Table 4-9, intensive management, allotments 517, 535, 532, 553, 557, 571, 572; the competition between antelope and livestock can be reduced by cutting the livestock numbers and season of use.

c. Page 4-25, Sage Grouse and Table 4-10, every effort must be made to protect meadows and riparian habitats. Also, the season long grazing systems in sage grouse habitats must be changed. In any case, either situation is the least desireable and must be corrected by equitable adjustments in the grazing systems.

d. In tables 4-8, 4-9, 4-10 management with private lands, the statement that scattered public lands would be generally controlled or managed by private land holders is an unacceptable situation. We recommend establishing cooperative agreements, isolated wildlife tracts or land exchanges that would consolidate wildlife habitats. To simply write off wildlife habitat because it is isolated by private land is taking the easy way out of an unpopular situation.

e. Page 4-23, Bighorn Sheep, the potential for increasing the distribution and/or population exists, however, no forage allocation has been made to accomplish this. We recommend forage allocations for the bighorn sheep so this action can take place.

3. General Comments concerning the proposed action.

a. Page 4-1, Assumption and Analysis stated here are "pie in the sky" statements. They do not take into account the various influences or demands placed on the management plans. Considering the present and future political and economic conditions will greatly affect the realization of these assumptions.

18.1 b. Item 2, page 4-1, how will the public know when the enviromental assessment takes place? Will Public Law 95-514, Public Rangelands Improvement Act of 1978 and the conference committee reports thereto be complied with? It is essential that the public representing wildlife interests be included in this process since the sites and specifications have direct impacts on wildlife. A key to this is timely and broad public notice.

18.2 c. Item 7, page 4-1, this statement is inconsistent with other statements concerning proposed land treatment actions.

18.3 d. Page 4-13, land treatments, this paragraph does not address specific consequences such as, where will the erosion go?

18

18.4 e. Page 4-14, spraying, this action does not specify the time of year spraying would be applied nor does it address any potential toxic effects to wildlife. What types of sprays will be used? If herbicides are used will they be clearly marked as cleared by the interagency board? Also, when chemicals are used will they be checked for all known effects? The EIS contains no reference that these precautionary steps have been considered. The wrong season of application or wrongful use could produce adverse effects on wildlife.

f. Fisheries would best be benefited by our recommendations, but either the proposed action or alternative 3 provides an acceptable method to achieve improvement. It is encouraging to see increased concern about the quality of the fishery in this resource area. It has been to long overlooked. We recommend that actions that will improve fish and stream habitat receive priority consideration.

18.5 g. The final EIS and future EIS' should be prepared and contain language that can be understood by the general public. We recognize that the document must meet legal requirements, but in our view the preparing agency has an obligation to prepare a document useable to the general public as well as the technicians and landholders. Past and present environmental statements have not been attune to the public's needs. This improvement should be met in the upcoming drafts and final environmental impact statements.

Although progress has been made, we still see the livestock bias appearing in this document. Since the passage of FLPMA in 1976 the participation by more of the public can be seen. It has not yet reached the proportions we would like but it is improving. Along with this development the urban populations adjacent to these lands have been rapidly increasing resulting in higher levels of recreational use. The means of access to these areas has correspondingly improved. The attitudes and philosophies developed as a result of the Taylor Grazing Act of 1934 and the political pressures of the livestock industry on BLM have been the primary cause of this status. Now with more competitive demands the situation has changed and all users must be treated equally. The balance needed has not been achieved in this draft environmental impact statement.

Sincerely,

Russ Heughins

Russ Heughins, [illegible]
District 3, [illegible]

Response to Letter No. 18

Letter number 18 contains several observations that do not deal with the adequacy of the Draft EIS and therefore are not responded to individually. The statements suggesting changes in the proposed action or alterntives have been considered in the formulation of Alternative 7, one of two new alternatives analyzed in the Final EIS. See the Consultation and Coordination section of the Final EIS for details of the evolution of the two new alternatives.

18.1 The BLM would comply with Public Law 95-514 in all respects, including consultation, cooperation, and coordination in the development of allotment management plans. Individuals or groups requesting to be involved in specific projects or allotment management plans would be contacted during preparation of the draft environmental analysis.

18.2 The assumption that the total acreage identified for land treatment would be completed is made to identify the maximum impact that could occur from such treatment. It is still true, however, that site-specific proposals would be analyzed and constrained to protect the resource values on a given site.

18.3 Because we have not identified the exact boundaries of the areas to be treated, we addressed expected general behavior. Appendix H, under "Sediment Yield," deals with the sediment delivery ratios. Generally, long-term soil erosion rates would be larger than the actual sediment yield because much of the sediment would be redeposited downslope. However, much of the long-term soil movement would find its way into drainage systems on a year-to-year basis or more rapidly following an abnormally high rainstorm or season.

18.4 Refer to pages 2-13 and 2-14 of the Draft EIS for restrictive measures to be employed on proposed vegetative treatments involving chemicals. Time of use and rate of application would be determined on a site-specific basis. Based on standard operating procedures and manual restrictions to be followed and adhered to, no adverse impact to wildlife is predicted.

18.5 The BLM strives to write EISs that are understandable. When specific comments are received that identify confusing passages or sections, we rewrite them for clarity. We did not receive such specific comments on the Owyhee Draft EIS.

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

19

REPLY TO ATTN OF: M/S 443

JUN 5 1980

D. Dean Bibles
Bureau of Land Management
Owyhee Grazing EIS, Boise District Office
230 Collins Road
Boise, Idaho 83702

Dear Mr. Bibles:

The Environmental Protection Agency has completed its review of the Owyhee Grazing Draft Environmental Impact Statement. You and the preparers are to be commended on the excellent effort and overall quality of the statement. We are especially pleased with the effort to quantify impacts where appropriate, the detail of discussion of environmental consequences, the commitment to monitoring of range condition and periodic reevaluation of the grazing plan, the excellent use of maps, and the objectivity of the presentation. The following comments may be helpful in preparing the final statement.

Due to the poor condition of the range, water quality, fisheries, and riparian zones, we agree with and support implementation of the proposed action. We believe that if present conditions and deterioration are allowed to continue, resource depletion and economic displacement would be deferred but would eventually be much worse, creating an unacceptable situation. We support your long-term approach to resource planning and management and believe that correction of the current situation is the most desirable management direction.

RESERVOIRS

19.1 The installation of 90 reservoirs can serve as an effective means of storing water for late summer use. It is not clear from the statement where these reservoirs will be constructed in relation to the streams.

19

If the main streams are dammed, siltation may fill the reservoirs within the foreseeable future. EPA recommends a system designed to divert the water to either a nearby natural basin or an adjacent drainage which has been dammed. The water flow to the reservoir can then be controlled, erosion rates would not increase significantly, the potential for washouts would be reduced, spillways may not be necessary, and storage capacity can be maintained.

CHEMICAL TREATMENT

19.2 The DEIS does not state which herbicides will be used to control competing vegetation. The herbicides which are planned for use should be explicitly stated. Mitigation measures such as adherence to label restriction, buffer strips established around all streams and reservoirs, and public notification indicating the time and location of spraying should be included.

MONITORING OF WATER QUALITY

Monitoring of range condition is an important program and we believe that monitoring should also be vigorously employed in relation to water quality. For example, this is especially important as it can provide feedback as to the effectiveness of the log structures.

19.3 Monitoring can also detect drift of herbicides into streams. Additional information on water quality and aquatic habitat monitoring should be included in the environmental statement, including parameters to be measured, frequency of sampling, and how the information will be used.

The Environmental Protection Agency has rated this draft statement LO-1 (LO - Lack of Objections; 1 - Adequate Information). This rating will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act, as amended.

Thank you for the opportunity to review this environmental statement. If you have any questions or would like to discuss these comments, please feel free to contact me or Scott Berg of my staff at (206) 442-1285 or (FTS) 399-1285.

Sincerely,

Roger K. Mochnick

Roger K. Mochnick, Acting Chief
Environmental Evaluation Branch

Response to Letter No. 19

19.1 The proposal is not to dam main streams, but to dam ephemeral drainages to impound spring runoff. See page 2-10 of the Draft EIS.

19.2 The herbicides proposed for controlling competing vegetation and the mitigation measures to be applied are described on pages 2-13 through 2-17 of the Draft EIS.

19.3 The water quality and fisheries habitat elements that were measured during the stream inventory (Appendix K) would be continued. Streams with high grazing conflicts and which have specific management actions related to attainment of fisheries habitat objectives would receive monitoring priority. Grazing use would be adjusted as necessary to allow objectives to be obtained. (see text change section).

Comments Received from Bill Lowry
BUREAU OF LAND MANAGEMENT OWYHEE GRAZING EIS.

20

This written testimony is designed for several purposes: No. 1. Further comment on the EIS Draft, No.2. As an addition to my oral testimony delivered at Marsing, Idaho, May 29th, and No. 3. to protest Alternative 6. as written by the Owyhee Action Committee.

Stream Bank Fencing: As in my oral testimony, fencing the stream banks and the log structures would not solve the problem, just create another and maybe a worse one. If there is a problem in a certain portion of a creek, it wouldn't be any great distance, it could be taken care of by seeding a good 'sodding' grass such as Canary Reeds Grass, and by salting on the ridges to encourage the cattle away from the creeks, and by buckarooing, which are all good management practices. Fencing pastures as suggested by O.Y.E.Action Committee would be the worst thing you could do. A lot of cattle in a small pasture at the time when you would be able to use it would do a lot more trampling than if left unfenced. One thing to be considered, when these cattle are fenced away from the creeks they have to go somewhere else for water, maybe causing a different problem. Another thing to consider, any fence has to be maintained regularly, if they are not they would pose just another threat to wildlife and livestock.

The type of Spring we have at the time the sagegrouse, chukar, quail, etc. are hatching determines in part their population numbers. A cold snow or hail at the time they are coming off the nest can wipe out the entire hatch or any part of it.

If the cattle and sheep industry were destroyed and the base properties were converted to different uses, wildlife as we know it would be all but eliminated.

I just cannot support the Alternative 6. that was prepared by the O.W.Y. Action Committee until there are several changes made in it. Generally speaking there is no flexibility in it. It is a narrow document designed to fit one operation, and without flexibility it won't work for the entire resource area. One of the areas that demands flexibility is turn out dates. You have to maintain the proper balance between base property and the Federal Range; one can't be depleted at the expense of the other. This Alterative is proposing some things the E.I.S. Draft doesn't ask for. It is proposing cuts that might not be covered in the Mc'Clure Amendment.

20

I am running short of paper so I won't list specific changes. I met with Mike Hanley and outlined some of the changes that had to be made. I would be happy to meet with the Action Committee and discuss needed changes. In a letter dated June 2, 1980 and signed by Mike Hanley and Dick Bass states in the third paragraph, "We have never worked with a more dedicated group of people than we did during the nine months of effort required in preparing the information, as a result, we presented our efforts on May 27, 1980 to the membership. The documents submitted on the EIS were in the form of a 6th Alternative to the EIS proposed action, the economic study prepared by the University of Idaho and a position paper on wilderness, all of which were accepted by the membership." The only copies there were to study was a copy of the economic study, the other two were read to us in part and then later we were asked to pass on them. I neither voted yes or no because I thought I would be'buying a pig in a poke! All testimony should be carefully studied, maybe someone has a better plan than the O.Y.E. Action Committee's Alternative 6.

In my testimony at Marsing on May 29,1980 I made the statement that generally speaking the rangeland is in good condition, which it is, but if(and I underline the word if), there is a problem it is isolated and should be dealt with accordingly, which means on an individual basis not area wide. One thing to remember is that the Owyhee Resource Area is a large area and the geography and climate varies so much from one end to the other.

If and again I underline the word if a problem presents itself, and I am realistic enough to know there is probably an isolated case, necessary trial steps should be negotiated between the B.L.M. and permittee(s) and the Advisory Board if requested by the Permittee(s) and no one else to correct the problem. State lands are already covered on exchange of use.

21

IDAHO WILDLIFE FEDERATION
Affiliated with the National Wildlife Federation

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June 4, 1980

James Gabettas
Acting District Manager
Boise District, Bureau of Land Management
230 Collins Road
Boise, ID 83702

Re: Draft Owyhee Grazing Environmental Impact Statement

Dear Jim:

I have reviewed the Owyhee Grazing EIS and find it both an excellent and disappointing document. It is excellent in the evident data base which was compiled as a departure point for assessment and formulation of a resource management proposal. It is disappointing in the manner these data were utilized in development of a resource management proposal and/or alternatives in the public's interest.

I submit the following, further assessment of this document as comment to preparation of a Final Environmental Statement on behalf of the Idaho Wildlife Federation (IWF) and the Natural Resources Defense Council, Inc. (NRDC). My thanks for this opportunity to make comments to a land/resource management proposal having significant importance to the many publics who know, use, and treasure the Owyhee Country.

As you know, I have been greatly concerned about the current conditions and management of rangelands and rangeland resources in Idaho. Both IWF and NRDC have sought means to improve rangeland conditions and management. Both support the efforts of the Bureau of Land Management to manage livestock grazing on these lands according to the multiple-use and stewardship principles mandated by the Federal Land Policy and Management Act (FLPMA) as well as to comply with the requirements of the National Environmental Policy Act (NEPA) in so doing. It follows, therefore, that adequate range EISs are the key means by which the management actions necessary to comply with FLPMA's mandates can be identified and their implementation supported.

21

The subject draft EIS reveals a scenario of serious resource management problems now evident within the Owyhee EIS area. As example: range condition and apparent trend are deplorable with some 90 percent of the rangeland currently in poor or fair condition with an equal amount either getting worse or, at best, just maintaining status quo; deer, antelope, and sage-grouse habitats have been subject to severe depletion with most rated as being 90-100 percent poor or fair condition;[1] fisheries habitat condition, water quality and quantity in poor or fair on almost all important fisheries streams to translate to the fact riparian/aquatic environments boast extreme degradation; cultural resources, while being identified as being in good condition, do in fact suffer impairment through livestock trampling and erosion; and, erosion, though rated at stabilized, occurs at rates 25 percent higher than what would occur were range conditions to approach excellent condition. Thus, the publically-owned resources of the area have been, and are being, adversely impacted. The draft EIS acknowledges the need for prompt changes in existing management practices, including reductions in current livestock numbers, in order to remedy these problems and improve current resource conditions.

As noted previously, I am impressed by the evident data base compiled as applicable to the Owyhee EIS area. And, I commend BLM in their recognition that at least fifty (50) percent of the annual vegetative growth must remain, in situ, to achieve some semblance of watershed protection and soil stability - a reserve "bank account" for land and resource management purposes. However, given this fact, I find a pronounced bias to accommodate domestic livestock grazing relative to the utilization of the remaining annual vegetative growth - the so-called "usable forage." I find this not in keeping with applicable law nor in the public's interest.[2]

1/ Bighorn sheep habitat is generally better, fair to good condition. This is primarily due the fact that the habitat into which they have been reintroduced (following their extirpation through competition and disease from domestic livestock) is a rugged natural area in good to excellent range condition which, so far, has escaped intensive range management and range development.

2/ At page 1-1, and elsewhere in the text, reference is made to an intention "to provide adequate forage to stabilize the local livestock industry." Although this qualifies as an admirable goal, perhaps, attention is drawn to FLPMA, Sec. 102 (8); Sec. 103 (c), (k), and to Public Rangelands Improvement Act (PRIA), Sec. 4 (b) wherein no reference is made to the necessity of stabilizing the livestock industry. To the contrary, with reference to the Taylor Grazing Act notwithstanding, it is mandated that: (FLPMA, Sec. 102 (8)).. .. "The public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmosphere, water resource, and archeological values; that, when appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use;..." This is a clear, definitive statement of intent by Congress relative to management of rangelands and rangeland resources.

21

21.1 The subject document is one drafted to assess the impacts of livestock grazing within the Owyhee Grazing EIS Area. However, livestock grazing is but one potentially applicable use, therefore, all use(s) must be considered in a prior overview assessment (a Management Framework Plan, MFP, - in accordance with BLM's planning procedures) with guidance and constraint, goals and objectives determined for the allowable uses to be made within the area. I do not find where this has been done in the subject EIS. To be sure, Appendix Table A-1 enumerates Single Use Recommendations (MFP-1) Livestock and Multiple Use Recommendations (MFP-2) with rationale and trade-offs enumerated for said MFP - 1 and 2 activities, but nowhere is there provided an enumeration or listing of the MFP overall guidance/constraint and goals/objectives applicable to subordinate activity planning. And, in this instance, those applicable to domestic livestock grazing within the Owyhee EIS Area appear only as recommendations, not as guidance, constraint, goals, or objectives. Thus, the "Objectives" enumerated at pp 1-1 and 1-2 can be considered no more than a shopping list, unsubstantiated with no rationale given for their selection or adoption. The subject draft EIS does not provide the necessary and relevant information about the MFP.[3] Text and table alike do not identify any watershed, wildlife, or other public interest objectives for the area, nor is there an explanation of why the Bureau has decided to implement intensive management of livestock grazing on the overwhelming majority of lands in this area. In the absence of these and other recommendations as well as an analysis of their rationales and the degree to which they will serve as an adequate basis for future management, one can neither fully understand nor evaluate the basic management decision with which this EIS treats, i.e., the decision to allocate the lands involved to livestock use.

21.2 As indicated, I believe the alternatives considered in the draft EIS have been improperly selected. While they do encompass various levels of livestock use, they also clearly reveal a predetermined intention to implement intensive management and only intensive management on the vast majority of lands in the Owyhee EIS Area. No one expects the Bureau to discontinue livestock grazing totally in this or any EIS area.[4] Similarly, no one would want, or expect the Bureau to permit the continued abuse of publicly-owned resources that is resulting from current management practices. Two

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3/ A statement is made, p 1-1, that: "Based on the response guides and other public input received during preparation of the Owyhee Management Framework Plan (MFP), several major issues stand out," but nowhere does one find how these issues were resolved, the rationale for resolution, nor the goals and objectives derived to guide and/or constrain activity planning relative to issue resolution/decision-making. It is indisputable that the EIS must explain how the MFP recommendations were derived. To be adequate, such an explanation requires: 1) an adequate description of the MFP recommendation; 2) a description and reasons underlying the basic land allocations and trade-offs which they represent; and, 3) an analysis of these reasons and the adequacy of the proposed recommendations.

4/ The principal reason for analyzing the no grazing alternative is to provide baseline environmental information against which to measure the impacts of all the other alternatives, including the proposed action.

21

21.3 of the three remaining so-called "alternatives"[5] involves an intensive management scheme that is comparable to the proposed action. The remaining "alternative" (Alternative 3) is likewise an intensive management scheme couched in a manner that seemingly would result in less livestock use while achieving greater wildlife and watershed benefits through reduced "usable forage" allocation, increased wild horse numbers, and elimination of land treatments. These are clearly not alternatives to the proposed action. Instead, they are simply variations on it. NEPA, however, requires the consideration of genuine alternatives, not variations. At a minimum, therefore, the final statement must consider a non-intensive management alternative.[6] Either this alternative or an additional one might well incorporate some of the concerns and recommendations enumerated in Tables 4-8, 4-9, and 4-10; Appendix Table A-1, and elsewhere as well as comprehensive protection of the critically important riparian ecosystems in the Area.[7]

21.4 The implementation schedule of the proposed action is one that infers rather than directs adjustment in use as predicated upon basic resource requirements (that is, if one assumes the percentage adjustment indicated reflects resource degradation and need for relief and improvement). More specifically, however, the implementation schedule is based upon whether management (AMPs or "intensive management") will be applied, and then only on an incremental basis, with those areas (allotments) which would not be managed under a grazing system having full adjustments immediately. This is neither just insofar as the operators are concerned nor does it recognize or implement adjustments in accordance with the need for resource protection. Criteria and a realistic implementation schedule as predicated upon those areas or situations of accelerated and/or serious resource degration is necessary to achieve resource stability and maintenance regardless of whether intensive management

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5/ Alternative 6 (submitted by the Owyhee Cattlemen's Association since issue of the draft EIS) is a further variation on intensive management, flexibility, and almost complete reliance upon the livestock industry to implement, maintain, and monitor the applicable intensive management program. This is both unwise and undesirable from the public's standpoint.

6/ A valid alternative might be one, say Alternative 3A (A Public Interest Alternative) wherein goals would be restoration of Class I demand, maintenance of a wild horse herd of 118-178 head, reliance upon natural vegetation through non-intensive management practices (adjustment to later turn-out date, proper seasons of use, rotation and deferment of use, etc.) with range improvements and land treatments limited and utilized only to accommodate non-intensive goals and objectives and/or to rehabilitation, and full accommodation of a diverse, viable wildlife fishery resource consistent with the capability to sustain applicable populations. In so doing, wilderness, recreation, archeological, and other public values would likewise benefit to the benefit of the general public.

21.5 7/ I am disturbed to find, given the Wetland-Riparian Area Protection and Management; Policy and Protection Procedures; Final Guidelines, dated February 5, 1980, and appearing in the Federal Register/Vol. 45, No. 25, no mention of these criterion in the subject draft EIS given the rather token consideration of riparian ecosystems in the draft EIS and their importance to the area. I suggest that the foregoing cited reference be given full consideration in drafting the final Owyhee Grazing Impact EIS.

21

is applicable or not. It is hoped the final EIS will correct this situation to provide protection to land and resources predicated upon need and not upon administrative dictum.

21.6 The proposed action and alternatives, generally, place great reliance upon glamorous, expensive range improvements and land treatments. The document does not bother to cite why, where, or what rationale was used to determine need of the proposed "improvements." Appendix Table H-2 provides criteria by which a shopping list of every conceivable acre can be identified for possible treatment, but there is no rationale for need or selection of a given land treatment in its contribution to overall management requirements. In like manner water developments and fences are even more vague as to need, location, and rationale. Further, the wildlife biologist and other "professionals" were forced to deal in generalities in assessing impacts (as related in the text and various tables, example: pp 2-12, 4-2; Tables 4-8, 4-9, 4-10). Thus, no definitive means is at hand by which to judge the proposed range improvements and land treatments.

21.7 In sum, the need for as well as suitability, rationale, and impact assessment of proposed range improvements and land treatments must be available to permit evaluation of such proposals. Further, certain minimum criteria is required to guide and constrain the selection of improvements and/or land treatments, as example: 1) seedings will be proposed only in those areas that would not be expected to respond to grazing management systems, 2) treatment will be proposed only in areas having suitable conditions (soils, climate, precipitation, etc.) to favor seed germination and establishment or otherwise favorably respond to treatment within a 1-3 year timeframe, 3) treatment will not be undertaken in known significant/critical wildlife habitats and riparian ecosystems unless made in full accord with an approved habitat management program for the area, and 4) all range improvements and land treatments must be cost-effective and justifiable. Because decisions to engage in range improvements and/or land treatments are essentially decisions to allocate lands involved to livestock use, as proposed in this and most grazing impact statements, these criteria must be incorporated into the Unit's land use plan.

21.8 In summary and conclusion, the final EIS must relate to the Owyhee MFP, its guidance/constraints, goals and objectives. There must be a clearer description of the various elements proposed in the draft EIS as well as for their selection and implementation. These elements are vegetative allocation,8/

8/ At page 2-2, Vegetation Allocation, the proposed action would allocate vegetation to "consumptive" and "nonconsumptive" uses with no background as to the rationale for this "allocation" nor assessment as to whether, in fact, such allocation will achieve the stated purpose, i.e., "watershed protection, aesthetics, small birds and animals, and other nonconsumptive uses." Further, we would challenge whether the forage allocation to antelope, deer, and bighorn sheep is consistent with projected and/or desirable populations of these animals. 21.9 I do not dispute the Bureau's responsibility to make such allocation; however, the draft EIS does not clearly explain the background for such proposals nor is there any attempt to analyze the adequacy of the proposed allocation. Absent this information and the MFP overview direction, one cannot determine whether the announced objectives, pp 2-1 and 2-2, are valid or obtainable.

Response to Letter No. 21

Letter number 21 contains several observations that do not deal with the adequacy of the Draft EIS and are therefore not responded to individually. The statements that suggest changes in the proposed action or alternatives have been considered in the formulation of Alternative 7, one of two new alternatives analyzed in the Final EIS. See the Consultation and Coordination section of the Final EIS for details of the evolution of two new alternatives.

21.1 The resource objectives, including their rationale for selection, which were developed during the land use planning process and have a direct bearing on the livestock grazing program are included in the text change section as an addition to Appendix A.

21.2 Since publication of the Draft EIS, Alternatives 6 and 7 have been developed and are included in the Final EIS.

21.3 See response 21.2.

21.4 The level of management intensity proposed (i.e. intensive management, less intensive management, and management with private lands) was based upon resource condition needs. The criteria for their selection is described on pages 2-5 through 2-8. The EIS recognizes that resource improvement would not be as rapid on allotments without grazing systems and therefore proposes immediate adjustments in livestock use.

21.5 The cited reference was considered during development of the aquatic wildlife MFP objectives and recommendations. The proposed management of riparian habitats brought forward from the MFP, (see Appendix Table A-1, Recommendations 8 and 9) and included in the proposed action, fully considers these guidelines.

21.6 The rationale for proposed range improvements and land treatments is discussed in Appendix Table A-1 (Recommendation 6 and 7). The location of proposed improvements is shown on Map 2-3.

21.7 The criteria and constraints for range improvement and/or land treatments are discussed on pages 2-10 through 2-17. All projects would be developed within the constraints described or they would not be constructed.

21.8 We have expanded Appendix A to include resource objectives and rationale from the MFP. We feel that these objectives, used with the resource recommendations and their rationale (Appendix Table A-1), and the description of the proposed action in Chapter 2 provides an adequate description of the various elements of the proposed action. The economic analysis considers the impacts of increased recreation that would result from the proposed action and alternatives (pages 4-49, 4-67, 4-95, 4-112 and 4-127). The economic impacts of watershed and vegetative condition improvement is indirectly considered through the assessment of increased forage production resulting from improved conditions.

21

21.8 the extensive vegetation manipulation projects and water developments as well as the proposal to implement intensive grazing management, protection and management of riparian ecosystems (as noted in prior text), conflicts between proposed grazing management systems and critical wildlife habitats, an economic analysis that treats only of the livestock industry and ignores other components of the social/economic health of the area (i.e., watershed, hunting, fishing, etc., both local and regionally), and a rational implementation schedule predicated upon resource requirements not administrative dictum.

In addition to the concerns already raised with respect to the implementation of intensive management, I am also concerned about the "normal flexibility" which will be included in these systems as well as the Bureau's ability to enforce the recommended utilization limits. It is clear that excessive utilization will prevent realization of the "benefits" which are predicted to result from implementation of the proposed systems. See Chapter 2, pp 2-1 through 2-18. Similarly, it is clear that, unless the proposed seasons of use and/or phenological requirements of key plant species are met, there is little if any reason to implement the proposed systems. See pp 2-5, 2-6, 21.10 2-7, 3-2, and 3-3. The draft explicitly assumes that the manpower necessary to achieve the needed utilization control and monitoring will be available. I submit that the Bureau, which has always suffered from a lack of adequate personnel, simply cannot make this assumption, particularly in connection with such a key element in its proposals. It is imperative, therefore, that an alternative be developed for the final EIS which addresses the realistic ability of the Bureau to develop and implement a resource management proposal within its capabilities to fund, implement, and maintain which balances the books between resource capability and demand with allocation predicated upon resource capability (current and potential) and full participation by all publics.

Finally, although the draft EIS contains much excellent data and analysis/compilation of certain of these data, it does not meet the test of applicable law in provision of a decision-making document for the manager in management of the public's land. It does not address a comprehensive approach to the land/resource management problems at hand. Rather, it is a document tailored to the implementation of a dominant use. Hopefully, these comments will assist you and your staff in preparing a final EIS that will select and implement those environmentally responsible management practices that will achieve stabilization, improvement, and maintenance of the land and its resources within the Owyhee EIS Area for this and future generations.

Sincerely,

William R. Meiners, President
Idaho Wildlife Federation

WRM:mjm

cc: Johanna Wald, NRDC
Robert Buffington, State Director, BLM

Response to Letter No. 21 (continued)

21.9 The background for the allocations is discussed in the MFP objectives (see text change section). The adequacy of various levels of forage allocation to consumptive and nonconsumptive uses is addressed in the impact sections of each alternative. By assessing the beneficial and adverse impacts of each alternative in relation to various levels of grazing use, the determination can be made whether or not specific allocations are adequate.

21.10 Alternative 7 has been developed to address these concerns.

22

June 7, 1980
Reynolds Creek
Murphy, Idaho 83650

W.E. Martin 1968

J.L. Schultz 1970

22.1 Here we are in 1980 and quoting two guys named Martin 1968 and Schultz 1970.

Who are these two? They must have their heads stuck up their posterior. Because they sure don't know whats going on.

To say that the Amercian Rancher lags behind in managerial efficiency and acceptance of innovation.

22.1 This is an insult not only to me but to our forefathers. People that have this physiology are usually talking on a full stomach. They probably like wormie apples and meat with maggots.

Me and my associates in agriculture have made the Amsrcians the best fed people in the world. If these two duds that arequoted in your E.I.S. draft, would look around at our young people they would find they are smarter, runfaster jump higher every year. All this due to our so called mismanagement and lack of innovation.

I am proud to be an Amercian and to be insulted by you and these two is just to much.

I don't know of any group that read more trade papers than the Amercian Rancher.

What works for one man may not fit my plans or operation. It's true we just don't jump into things to find out if they work or not, because we would like to be here next year.

I have gone from a complete non mechanical horse outfit to a complete mechanizs operation. Things like this is not done over nite or just because they are more efficient. But we must pay for all these modern machines.

page 2 22

It is sad we must go back to 1968 and 1970 for dribble like this because I can't run my outfit on 1968 and 1970 idess.

Thank you
Richard Bass
Richard Bass

22

June 7, 1980
Reynolds Crsek
Murphy, Idaho 83650

Fish Populations
Page 3-18

To state that the so called Redband trout is a sensitive species, is hopsful thinking on someones part.

22.2 From evsrything I can find on the research of the Redband thers are a lot of conflicting ideas on whether this fish is a seperate species.

In the light of all of the conflicting reports, I think you are premature in your judgemsnt.

Thank you
Richard Bass
Richard Bass

22

June 7, 1980
Rsynolds Creek
Murphy, Idaho 83650

H-1 Appsndix H
Musgravs G W 1947

22.3 To use Musgrave Equation that was devsloped forflat agricultural land, on steep range land's just won't work without using his orginal equipment under Western range conditions.

Thank you
Richard Bass
Richard Bass

Response to Letter No. 22

22.1 Economists Martin and Schultz reported on certain attitudes of some ranchers. These attitudes are not universally held in the livestock industry. Reference to some aspects of their reports are deleted. See the text change section.

22.2 The redband trout is listed as a "sensitive" species by the Idaho Department of Fish and Game and the BLM. The Idaho Department of Fish and Game is responsible for management of the species and decides what management goals are appropriate. There is speculation about the taxonomy of the redband trout, but a genetic study of the trout in Owyhee County is underway. Preliminary results from this study coupled with life history information from the Owyhee fishery inventory suggest the uniqueness of this trout. Whether or not it is determined to be a separate species, it is a unique group of trout which can be maintained and enhanced through proper management.

22.3 See Response 6.12.

BSU
Conservation
Group

To: Idaho State Director, Bureau of Land Management
From: Boise State University Conservation Group
Concerning: Owyhee Grazing Environmental Impact Statement Draft

GENERAL COMMENTS:

Due to the diversity of habitats present in the EIS area, a wide variety of wildlife species are present. This area supports 158 resident and 183 migratory species, comprising 71 mammals, 244 birds, 19 reptiles and eight amphibians. Habitat diversity results from a broad array of vegetation types and the inclusion of special habitat features such as cliffs, snags, reservoirs, springs, meadows and streamside riparian zones.

The BSU Conservation Group is recommending a modified Alternative 3. We feel that Alternative 3 will benefit wildlife populations through improvement of vegetative conditions, a decrease of soil erosion rates, and improvement of water quality and fisheries habitat. However, we do not recommend that the wild horse population be allowed to increase above current levels.

SPECIFIC COMMENTS:

- As indicated by the 1977-78 BLM range survey, 93 percent (366,400 acres) of the winter range and 95 percent (387,400 acres) of the summer range of the mule deer, Odocoileus hemionus, habitat in the EIS area is in poor or fair condition. This is primarily due to livestock overgrazing which has reduced the amount of palatable browse needed by the deer.

Alternative 3 would significantly improve vegetative conditions on all allotments. Improvement of range condition is needed to support an increasing deer population currently estimated to include 1,880 deer using the summer range and 2,905 wintering deer.

- Resident and migratory herds of pronghorn antelope, Antilocapra americana, utilize approximately 427,500 acres of winter and summer range within the EIS area. The BLM range survey has shown that 95 percent (406,100 acres) of the antelope range is in poor or fair condition.

Alternative 3 will enhance and help to increase antelope populations by improving the range condition. Competition occurs between all herbivorous animals (both livestock and wild species) when the ranges are in poor condition. Little or no competition occurs, however, when the ranges are in good condition.

- Sage Grouse, Centrocercus urophasianus, populations would also be enhanced by implementation of Alternative 3. Of the 187,600 acres used by sage grouse for nesting, only four percent is in good condition while 37 percent is in fair and 59 percent is in poor ecological condition. This results in less cover for nesting and lower brood success rates due to predation.

- The most beneficial aspect of Alternative 3 will be the protection of sensitive riparian areas from overgrazing and trampling, by fencing 113 miles of streams and placing log structures on another 36 miles of streambanks.

Waterfowl nest adjacent to most reservoirs, stock ponds and major creeks within the EIS area. In the spring waterfowl depend on adequate cover in the upland areas for nesting. Broods depend on emergent aquatic and shoreline vegetation for cover and food. Nesting and brood cover are generally in very poor condition due to the heavy utilization of these areas by livestock.

- Several important species closely associated with riparian zones include beaver, Castor canadensis, river otter, Lutra canadensis, valley quail, Lophortyx californicus, and mountain quail, Oreortyx pictus. Most wildlife species in the EIS area use riparian habitats disproportionately more than any habitat type available. Consequently, many species are severely impacted when riparian areas are damaged. The structural diversity offered by a tree layer, a shrub layer, and a herbaceous layer provides large amounts of nesting, roosting, hiding, escape and thermal cover for both high densities and many species of wildlife. Additionally, riparian vegetation provides many important food plants such as aspen, cottonwood, willow, maple, currant, rose, and grasses and forbs. Riparian vegetation remains green and nutritious longer than the surrounding upland vegetation.

Livestock concentrate in meadow/riparian habitats due to the presence of water, green forage and in the case of riparian habitats, shade. In the EIS area, about 36 percent fo the 421 public miles of major riparian habitats are severely impacted by livestock. These overused areas exhibit lower vegetation diversity, limited tree and shrub canopy, a high occurrence of undesireable species and inadequate reproduction of desirable plants.

- Livestock grazing is a major conflicting activity to overall good fisheries habitat condition in the streams in the EIS area. Of the 316.7 miles of perennial stream on public lands, 141.6 miles are rated in poor condition, 125.1 miles are rated in fair condition and 50 miles in good condition On these perennial streams, 93.6 miles were rated as having a high degree of cattle grazing onsite conflict with fisheries habitat and 22.4 miles were rated as having a moderate degree of conflict with fisheries habitat condition.

- The wild horse, Equus equus, population, currently numbering about 324 animals, should be decreased to at least 1971 levels (118 head censused). Nonendemic wild horses serve no purpose and compete with native ungulate species for forage.

Bill Laurance, Director, BSU Conservation Group 6/7/1980

Comments upon Owyhee Grazing EIS.

Z-3

HEREFORDS AND HORSES
Bill and Phyllis Ross
Jordan Valley, Oregon 97910

TO: BUREAU OF LAND MANAGEMENT June 9, 1980

My interest in the adoption of a range management and improvement policy in the Owyhee Resource Area is two-fold: To provide a program that will improve the resource in its many facets and to permit a livestock industry that is dependent upon these lands to remain healthy and productive in the immediate future, as well as on a long term basis.

24.1 I contest the validity of the range survey which indicates a need for an average 32% reduction. The utilization studies upon which these determinations were made were conducted during abnormally bad growing years, including 1977, in which we had a major drought.

24.2 The trend indications advanced by the EIS are not accurate in my opinion, either. In areas with which I am most familiar, I have observed a gradual upward trend for the past 12 to 15 years. It has been my observation, as a resident and user of this range for half a century, that there is a great variety in annual forage production determined by the amount of moisture and the suitability of the growing season from one year to the next. This factor is much more significant than a trend. A year with exceptional moisture and a very favorable growing condition will bring out dormant plants, both perenial and annual that don't appear to exist during unfavorable moisture and climatic years.

24.3 I refer especially to the Juniper Mountain Unit and specifically to the Bull Basin Allotment, because that is the area with which I am most familiar. Since the range adjudication about 1966, the establishment and implementation of an AMP following that action there has been significant improvement in the overall condition of the Bull Basin Allotment. This has been accomplished in spite of the fact that there has been no follow through on range improvement programs as promised by the Bureau at the time of the adjudication. Actually, with the exception of construction of two small reservoirs and development of four springs in 1968 and construction of fences to form the various fields, there has been no range improvements funded or accomplished by the Bureau in this allotment.

Various economic studies on the economic effect of changes indicated by the proposed action in the Owyhee Resource Area, particularly that study by Neil Rimbey, indicate substantial far reaching effects upon the cattlemen involved as well as substantial adverse effects upon the economy of the rest of the immediate area.

I submit that there is a moral necessity for the Bureau to develop an alternative that will permit accomplishment of sensible improvement goals without forcing even one operator out of business or causing undue financial hardship upon the ranchers involved. It is small condolence to a rancher who is strapped by inflation, labor problems, etc. to know that cuts will be restored in 15 years or that usage will increase by 50% above the current level 20 years from now, if he is not going to be able to operate next year or for 15 more years. Agriculture is one of the basic industries in the U. S. and utilization of the renewable resource, GRASS, by cattle grazing is an integral part of agriculture. Throughout the years it has contributed significantly to the growth of our country and has helped win several major wars. It deserves to be preserved and warrants consideration in Bureau decisions.

24.4 I strongly resent the statement on page 3-34 of the EIS that cattlemen "lag behind other sectors of American agriculture in areas of managerial efficiency and acceptance of innovation". The implication of that section is that cattle ranchers are oafish individuals, too lazy and stupid to care about anything but maintaining his easy going, ignorant way of life.

I will offer that there have been advancements in technology and improved techniques in cattle raising during my life-time that rival any other branch of agriculture. I further submit the suggestion that a basic part of a cattleman's philosophy is his contempt for and distrust of bureaucrats. It is also noted that the chief source quoted, J. L. Schultz, is a bureaucrat (USDA).

It is difficult for me to apply the proposed action or any of the alternative to the area because of my prior stated belief that the range survey was in error. If that is the case, then none of the figures really fit and the remedies aren't necessarily valid.

However, in my view, a modified alternative 5 would seem most practicable. Here, I'll state that I do not favor abusing the range; that my goal is for an improved, healthy resource. Neither do I ask for a program that will enhance grazing at the expense of other values. The needs of wildlife, wild horses, recreationists, etc. must be protected. But I do feel that livestock grazing is the highest and best use for most of this area so their needs must be recognized and proved for.

24.5 I object to stream fencing in most instances. Again, referring specifically to my own allotment and area, I note that proposed action some 21 miles of fence would be constructed along Red Canyon Creek to help maximize the fishery potential of that stream. This creek is small and often dries up in long stretches each year. Fishery potential is small, and it seems extremely impractical to me that this much fence should be needed and the corresponding large expense incurred in an attempt to create a significant fishery. These funds could be better utilized in other endeavors where the results would be more significant. This stream is not an isolated instance, but the case is much the same in many of the other streams mentioned.

24.6 I also protest the proposed practice of placing log structures along stream banks in most instances. This practice involves a large amount of hand work; hence, is extremely expensive and yields little significant improvement.

As stated, Alternative 5 does not include the above practices. It is noted that cost of implementation of Alternative 5 would be $6,000,000 as compared to $2,400,000 for the proposed action. My thought is that the difference is insignificant if the economic well being of the grazers is preserved. My feeling, too, is that the funds expended would be used in a much more beneficial way for the resource under the Alternative 5 program.

I would recommend a program, beginning as soon as possible, under which each individual allotment or each common use area would be considered independently. A program would be worked out between the operators and the Bureau which would consider the long range goals and potential for each area and which would determine each individual's ability to achieve them and still exist as an economic entity. No cuts in usage should be instituted at the outset but usage should be closely monitored during the first two years and voluntary adjustments, if needed, worked out then. The goal should be to maximize forage production and resource condition over an extended period of time, allowing the various individual operators to exist an an economic entity during the improvement period. In some instances, these goals might be accomplished in a short time -- say ten years. In other areas, it would take much longer -- maybe 25 to 30 years. Future weather patterns would certainly be a factor and would have to be reckoned with as they occured. Hopefully, there would be more favorable growing years than unfavorable, but that can't be depended upon. During some really bad years, probably no improvement would be accomplished and occasionally the favorable trend might be reversed for a year or two, but through this co-operative, co-ordinated venture the long range trend would be upward.

Methods for range improvement should be used that are compatible with other resource values. We do not want to damage any other legitimate resource use because this should truly be a multiple use effort. However, it has been my observation that whatever practice benefits livestock range nearly always is beneficial to other multiple uses.

Specific items in the proposed action that I object to are listed: We see Hormay's Rest Rotation system mentioned repeatedly throughout the statement but it is never applied to any instance. The proposed action would permit no more than 50% utilization in any pasture which is in direct contrast to Hormay's system under which a given pasture may have complete utilization every third year or so provided it has complete rest or even deferred use through seed ripe time every third year. I approve the Hormay program in many situations but feel that it must be applied in it's entirety to be

24

effective.

24.7 I object to the policy statement on page 2-17: "If utilization limits are reached in all pastures scheduled for use prior to the end of the scheduled grazing season, livestock would be removed from the allotment". This policy would create extreme hardships on users during those years in which drought or other unfavorable weather factors are responsible for below normal forage production. Other natural phenomenon, such as range fires or grasshopper invasion of an allotment could force an entire allotment to reach the desired utilization level early in the season. It is my contention that in such situations, greater utilization should be permitted. It is an accepted fact that we have adverse years quite frequently in this area when range production is low. A livestock operator must be permitted to survive during these years. There is always a shortage of pasture available for lease, at any price, during these years and a rancher cannot always afford the inflated prices charged for forage during adverse times. It's possible that a much larger utilization on BLM lands should be permitted in the event of such emergencies.

24.8 The proposal to set turn-out dates back two to three weeks would create an often insurmountable hardship on ranchers. Early season feed is extremely hard to find. Few ranchers have access to grass early in the season, and hay feeding for an extra two or three weeks can be prohibitive in price. Also, cattle have a tendency not to do well in confinement at this time of year. Calf scours and other diseases are often rampant under such conditions. The maximum benefit to cattle on range comes during the period of green grass and that period is always too short in this area. For those whose operations would permit a later turn-out without creating undue hardships such adjustments could be arranged, but for those others, such a requirement would be extremely difficult to accept.

24.9 I protest the proposal that fence posts would be solid, non-reflective color. Such a practice would create an unnecessary hazard for livestock, game, horsemen, ORV's, etc. Visibility of fences should be maximized.

Response to Letter No. 24

24.1 The range inventory was conducted professionally using established BLM guidelines and procedures. It provides the most accurate information regarding vegetative production presently available. Production data collected during 1977 was adjusted upward to reflect what would normally occur in an average year.

24.2 By comparing vegetative condition data collected during the 1960s with data collected during 1977 and 1978, static or downward trends are indicated on the majority of the EIS area. We agree that annual vegetative production varies greatly depending on moisture and growing season conditions. Vegetative condition however, changes less dramatically and is felt to be valid to use in determining long-term vegetative trends.

24.3 Our data indicates that vegetative trend in the Bull Basin and Bald Mountain Field is downward, static or nonapparent. The trend in the Summit Spring Field is primarily downward which results in the majority of the allotment to be shown in a downward trend.

24.4 See Response 22.1

24.5 Natural barriers to livestock grazing would be used with the fencing of access areas to protect this stream. This would cut the cost of fencing the stream considerably. Although the stream is small, the redband trout population is moderate in some stretches of the stream. This stream has much potential for improvement, and streamflow and water depth should increase with riparian vegetative improvement. This stream also provides a means of maintaining the gene pool of a unique species, redband trout, since it has not been planted with hatchery stock and is relatively isolated.

24.6 These log structures would be less expensive than stream fencing. They have been effective in improving fisheries habitat in eastern Oregon where 97 percent of the log structure projects implemented have been successful. Although the log structures would require some hand work, they are relatively simple structures to install along the streambanks. Also, log structures would only be installed on the segments of a stream which needed improvement. They would also be confined to stream segments without stream meander to reduce cost and the loss of structures during high water.

24.7 The text has been changed to address the impacts of below normal forage production years (see text change section page 4-47).

24.8 The impacts of additional hay cost and later turnout dates was addressed to the extent possible on pages 4-44 to 4-51 of the Draft EIS.

As stated, calf scours and other diseases could occur if the turn out dates are set back two to three weeks. However, if the allotment is under a grazing system that leaves old feed in the spring pasture, or on early turn out pastures, seasons-of-use would not change or would be similar to the existing seasons-of-use.

24.9 Experience with nonreflective fence posts on other BLM land does not indicate there would be significant adverse impacts.

WHOA!

25

WILD HORSE ORGANIZED ASSISTANCE
INC.
A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

P. O. Box 555
Reno, Nevada 89504
Telephone 323-5908
Area Code 702

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In Memoriam
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

June 7, 1980

Bureau of Land Management
Owyhee Grazing EIS
Boise District Office
230 Collins Road
Boise, Idaho 83702

Gentlemen:

The Owyhee grazing environmental impact draft leaves little opportunity for encouragement for those citizens interested in the proposed action and the affects upon the wild free-roaming horses and burros.

The proposal states the HMA will be established, horses will be removed from all areas outside the HMA; then further states that grazing preference (pg 2-4)must be satisfied when additional forage becomes available. Not only do the horses not have priority on the HMA, but the additional forage--primarily through their reduction and the grazing systems--will only satisfy commercial use.

Improvements such as fences will further confine them within their own habitat. With the use of only 12% of the EIS area, this is a further thorn in the side of those other resource interests.

In the programing stages, the agency has utilized past, present, and future population estimates to project the impact of wild horses and burros upon the public rangelands; usually to support a reduction in their numbers. Range statements are assumptions and the calculations are based on licensed or permitted use of livestock. The April 14, 1978 (Civil No. 1983-73) court action states in part 25.1 ". . . discuss in detail livestock grazing activities. . ." If the impact of wild horses can be presumed; we see no justification why records (9230-8) of past, present and predicted illegal use cannot be included as an impact in the EIS. This should be recognized in the exisiting conditions.

The social values of Americans should also be accounted for as it applies to 25.2 reseource management of their public lands. We take exception that lifestyle was a single most motivating factor in livestock operations. They would not be there if the financial rewards did not derive some monetary satisfaction. We also question their freedom from federal subsidies, in one form or another--whether they wish to admit it or not-- they are subsidized by taxpayers or the government, range improvements, predator control, soil conservation, etc.

25

Page two
Owyhee EIS draft

(pg 4-1)
25.3 The removal of nearly 50% of the wild horses is an significant action, will site specific studies be made on the impact of such proposals on wild horses?

(pg 4-10,4-18)
25.4 Would water developments, partially funded with tax payer dollars be open year around for use by horses?

25.5 Usually the horses are the first range user to experience the impact of the EIS, they are reduced immediately. What is the guarantee that funds will be available, or man-power for that matter, to implement the proposals?

With the exception of range improvements such as fencing we find we must support Alternative 3, despite some reservations. We do not feel horses will be adequately represented under the proposal or any other alternatives.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

cc: Board of Trustees

Response to Letter No. 25

25.1 The table below shows the documented trespass for the past five years. The average for this period is 246 AUMs, (less than one percent of the average five-year licensed AUMs). This use has contributed to present resource conditions.

Documented Trespass

Year	Number of Livestock	AUMs
1975	236	107
1976	381	169
1977	1,072	310
1978	2,505	505
1979	890	139
TOTAL	5,084	1,230

25.2 The discussion of subsidies on page 3-34 of the Draft EIS was describing an observed attitude. The description is believed to be accurate.

25.3 Site-specific environmental assessment would be completed as described on page 4-1, number 4 of the Draft EIS.

25.4 Where wildlife and/or wild horses become dependent on water sources on public land, those sources would be left open for their use. See text change section.

25.5 There is no guarantee of a specific level of funding in future years. However, we believe that assuming adequate funding would be available to implement the proposed action or alternatives is a reasonable assumption upon which to base analysis of impacts.

United States Department of the Interior
FISH AND WILDLIFE SERVICE
AREA OFFICE - IDAHO AND OREGON
4620 OVERLAND ROAD, ROOM 238
BOISE, IDAHO 83705
FTS 554-1960 / COMM 208/384-1960

26

JUN 12 1980

TO: D. Dean Bibles, District Manager, Bureau of Land Management, Boise

FROM: Area Manager, Boise

SUBJECT: Draft Owyhee Grazing Environmental Impact Statement

We have reviewed the subject document and have the following comments.

General

Alternative #3 is preferred because of its more favorable environmental consequences and it appears to be a more balanced compromise between extremes. Alternative #3 could be improved by omitting the provision for increasing the number of wild horses. Such an increase would benefit neither the watershed nor wildlife resources. The number of wild horses should be kept to a minimum.

Specific Comments

Pages 4-27 and 4-28. Summer use of range seems acceptable; however, riparian habitat should be given more consideration in management schemes.

We appreciate the opportunity to comment on this draft environmental impact statement.

L. A. Mehrhoff

CONSERVE AMERICA'S ENERGY

Save Energy and You Serve America!

JOHN V. EVANS
GOVERNOR

OFFICE OF THE GOVERNOR
STATE CAPITOL
BOISE 83720

27

May 25, 1980

Mr. Robert Buffington
State Director
Bureau of Land Management
Box 042, Federal Building
Boise, Idaho 83724

Dear Mr. Buffington:

It is with a great deal of pleasure that I offer my comments to you regarding the Draft Grazing Environmental Impact Statement for the Owyhee Resource Area. The positive, constructive and cooperative approach taken in the development of the draft document is commendable.

I am particularly gratified that the Boise District Staff and the Action Committee of the Owyhee Cattlemens' Association have demonstrated their long-standing tradition of cooperation by jointly developing a sixth alternative.

The sixth Alternative is very similar to the BLM's proposed action. It differs, however, in that it includes innovative practices and procedures which were not included in the proposed action. It should result in an accelerated rate of response in resource improvement over the proposed action. That effort illustrates the ability of the Bureau and the range users to cooperatively participate in the management and development of their rangelands.

The Range Resource Management Subcommittee of the National Governors' Association, which I cochair with Governor Bruce King of New Mexico, has consistently urged that cooperative, coordinated range management on public and private rangelands be adopted as a national policy. Your precedent-setting action here will, in my judgment, provide proof that our rangelands will benefit far more rapidly from a cooperatively developed program of action than from one which does not adequately reflect all the environmental, social and economic needs of the area.

27

I would emphasize the importance of allowing adequate time for planning and implementing decisions based on cooperatively developed Allotment Management Plans. A full year or more must be set aside for the limited BLM personnel to work closely with range users in the Allotment Planning Process. Grazing reductions, if required, must be phased in over at least a five-year period to allow time for management and improvements to minimize unnecessarily severe reductions. It also allows for improved understanding and cooperation between users and BLM personnel. I recommend an approach similar to the Zimmerman Approach now under consideration by the BLM.

Where interest exists, Allotment Management Plans should include associated private and state lands in order that every opportunity for resource enhancement may be considered. 27.1 I note with concern that private and state lands are not considered in the EIS. I am heartened, however, that the Boise District Manager and his staff have been working with private landowners, state agencies, the Soil Conservation Service and other interests in the development of interim coordinated management programs which are speeding the rate of improvement on the ranges.

It is a pleasure to take this opportunity to commend the ranchers, the state and other federal agencies, and the Bureau of Land Management for developing an Environmental Statement and a proposed action plan which will strengthen the livestock industry, our environmental quality and which will also promote harmony and cooperation between the varied interests.

I pledge my continued support to encourage similar cooperative efforts throughout the public rangelands.

Very truly yours,

JOHN V. EVANS
GOVERNOR

dpt/dc

28

Star Route
Marsing, Idaho
[illegible]
June 14, 1980

B.L.M. Office
230 Collins Road
Boise, Idaho
Att: Oscar Anderson

Dear Mr. Anderson;

Enclosed are my comments on the proposed action of the B.L.M., Boise Dist., Owyhee County.

I feel that each allotment must be looked at and judged on its elevation and soils. The 50% utiliztion should be some what flexable on a dry year, if a user has alternate fields for next year.

I feel that range development should go at a fast a pace as possible, for it will benifit all users for public lands.

I feel very strongly that the B.L.M. and the user should work together to form a workable management plan to benefit both.

The wildhorses in Sands Basin, is a bad example on the range. The B.L.M. must find the money to control them, as they will over graze the bunch grass and start in on the bitter brush, that is important to wildlife.

They must be managed at the 1971 levels. A rancher should not take a cut on something he can not control himself

There should not be a cut to a user until a study has been made on each allotment he is involved in. The rancher should be present at time of grass study. Many times untraind personnel can get in the wrong field and only look at the grass close to the road or water.

On the fish and game part, I feel that the fish and game must manage the game for the wildlifes own good, not just for the hunter. Wildlife and stream beds would get better with more water development and seedings.

They are on the right tract in our area by having buck only hunting. If they will leave bucks only and shorten the season, the deer herd will continue to improve.

In 1977, we had 7 head of deer in our fields, in 1979 we had 30 head of deer in our fields. When riding for cattle we are seeing more deer each year. In Juniper Springs allotment, there is an abundance of bitter brush.

The Vale Dist. is a good example of how much grass can be grown with seedings and spraying. The turn out date has remained the 1st. of April, in the Rockville area. By using alternate pastures the range grass has improved every year.

28.1 Some of the fisheries that are involved, McBride Cr. in particular are to undependable to have fish. Many years the creek is completely dry by late summer.

I feel that alternative 6 as ammended at Jordan Valley the 9th of June is as good a plan as we can come up with at this time. Co-operation between B.L.M. and ranchers is essential for any action to work

Thank you for considering this.

Mark Shenk

Response to Letter No. 27

27.1 The impacts of the proposed action and alternatives on private and state land were considered to the extent possible. They were not included in the proposed management since the BLM does not have management authority over these lands. As allotment management plans are implemented, associated private and state land would be fully considered. The BLM intends to involve all landowners on management actions affecting intermingled lands.

Response to Letter No. 28

28.1 Improvement in riparian vegetation through the improvement measures identified on McBride Creek should, over time, increase the water depth and stream flows. This stream has been surveyed in the late summer months and appears to have a high potential for supporting redband trout with these improvements.

STREETER REAL ESTATE
P.O. Box 121
Mountain Home, Idaho 83647

29

June 9, 1980

BLM Regional Office
230 Collins Road
Boise, Idaho 83701

Gentlemen:

I would like to register for the record our thoughts regarding the Owyhee Resource Area EIS on Grazing. We feel that there should be no cuts on grazing allotments, better and more reasonable management is needed and there should be no cuts in animal units.

We strongly feel that this area must be classified as a multiple use range. We recommend that cooperative studies with the SCS, State Land Board, range specialists and the University of Idaho be made to determine the most feasible multiple use concept for the Owyhee resource area.

Very truly yours,

Jack Streeter

Jack Streeter, Member
Board of Directors
Southwest Idaho Development Assn.

JS/ms
cc: Don Brandt

Bruneau River
Soil Conservation District

P.O. Box 167 - Grand View, Idaho 83624

30

JUne 6, 1980

Bureau of Land Management
Owyhee Grazing EIS
230 Collins Road
Boise, Idaho 83702

Dear Mr. Bibles:

We would like the following to go on record in reference to the Owyhee Grazing Environmental Impact Statement Draft:

> We as farmers and ranchers feel that grazing cuts should be staggered to levels that ranchers are able to survive with. Very severe cuts all in one season could very well put a rancher out of business. With estimates of 21 out of 83 operators facing extreme difficulties in remaining in the business, we feel that the proposed cuts outlined are much too severe.
>
> We also feel that ranchers should definetely have input into any plans that are developed and implemented. We strongly support co-ordinated ranch planning.

We hope that you will take these suggestions under advisement.

Sincerely,

Merle Bachman, Chairman

Public Hearing - Boise, Idaho May 28, 1980

Jan Beckwith - Owyhee Co. Historic Preservation Officer

Comment 31.1: The Grazing EIS does specifically mention historic site destruction, and ranks damage to sites from livestock as second. I think that's misleading. It is the neglect that leaves the site open to the listed No. 1 aging, weather and decay, which puts the site in a fragile position in the first place.

Without human interference, there is no feasible way to protect these important historic resources from eventual obliteration whether from wind, rain, vandalism, or cattle.

In evaluating this Grazing EIS in relation to the historic resources, I see that if the fate of the ranch unit is made precarious, then precarious is the fate of all the historic resources connected to that unit.

Response: We do not have information or a sound basis to conclude that historic resource sites would be neglected if present ranch units are made precarious. If changes in ownership occur, new owners may or may not maintain sites in their present condition. Therefore, we do not have an objective basis to predict that our management actions would be adverse or beneficial.

Russell W. Heughins - District 3, Idaho Wildlife Federation and the Idahoans for Public Lands

Comment 32.1: On public lands that are interspersed with private lands, no provision is made to determine impacts on wildlife utilizing these areas, nor is any management proposed.

Response: Based on the anticipated vegetation improvements due to reduced livestock use, 64 percent of BLM lands in these tracts will be in fair, good and excellent condition (Appendix Table F-6). This is an improvement over the present situation of 54 percent being in good, fair and excellent condition (Appendix Table F-4). With more cover and forage available, wildlife populations will derive some benefits from this action.

Improvements to wildlife habitat will occur, but without control over the season-of-use, the degree of these improvements cannot be quantified. Tables 4-8, 9, and 10 have been modified accordingly (see text change section).

Comment 32.2: Since this decision-making process provides for and is directed by FLPMA, it is essential that the public be able to analyze this document. It is our view that this document falls short of that goal. It contains unfamiliar technical knowledge and terms and is difficult for reviewers outside of the bureau, the livestock industry and associated professionals to understand. Therefore, we recommend that the data and language contained in the Final EIS be attuned to the needs of the general public.

Response: See Response 18.5.

Mike Mogensen - Idaho Cattlemen's Association

Comment 33.1: In this draft statement, range conditions are evaluated on a one year basis or one time study. We feel that this is inadequate. In order to get an actual trend study, we need at least five years or more on trend studies of the range.

Response: Range conditions were evaluated in the 1960s and during the vegetative inventory conducted in 1977 and 1978. See Response 2.7.

Tim Lowry - L.U. Ranching Company

Comment 34.1: Also, in the proposal to fence the streams, I believe that that would create as many problems as it is designed to correct. In the area that I am familiar with, it would create pockets which would get overly used, heavily utilized, and it would exclude grazing from other areas which would be under utilized and create a very uneven utilization pattern.

Response: The construction of stream fences would affect utilization patterns similar to pasture and allotment boundary fencing. Fences would be constructed to minimize heavy grazing pressure where possible. It is anticipated that the proposed grazing system would provide vegetative improvement even though some areas would be grazed heavier than desired levels. By design, utilization levels may be lighter within stream protection areas as a means of improving riparian habitat.

Comment 34.2: In the summary on page 4-52, there is a statement that those ranchers receiving additional AUMs would have more confidence and positive feelings about government activities and decisions. I believe, however, that this is an erroneous assumption. I'm afraid that what will happen is that there will actually be a hardening of anti-government attitudes and feelings of helplessness when we see our friends and neighbors forced out of business.

Response: See Response 16.4

Public Hearing - Marsing, Idaho May 29, 1980

Mike Hanley - Owyhee Cattlemen's Action Committee and Malheur Cattlemen's Association

Mr. Hanley presented an alternative for consideration in the Final EIS as part of his testimony. This alternative, as revised, is included in its entirety following the comment section. The Consultation and Coordination section describes the evolution of this alternative into Alternative 6 of the Final EIS.

Comment 35.1: The sociological information must be rewritten on Page 3-34 under social values and attitudes. Shultz, obviously at least in the quotes from his study, has little understanding of the people he based his study on.

Response: See Response 22.1.

Comment 35.2: I'm of concern that past reductions taken by operators was not considered. If not, this could place an even larger number of operators in jeopardy since they have in some cases already taken 50 percent reductions or more. Even a reduction of 10 percent or less could eliminate them.

Response: Any past reductions are reflected in the ranch budgets. If past reductions have affected the viability of the ranchers, it is shown in the budgets.

Comment 35.3: The Grazing EIS is on federal grazing land, but it must be recognized that it, along with private and state land holdings, form an ecosystem which makes it impossible to separate one from the other.

Response The interrelationship of public, state, and private land is described on pages 2-31 through 2-33 of the Draft EIS.

Comment 35.4: It is important that when range condition is depicted as on maps within the EIS Draft, that we look at the condition as an apparent trend and not just a listing of fair, good, or poor.

Response: Map 3-3 of the Draft EIS depicts condition and trend. These two terms are defined on page 3-2. Also, see response 2.7.

Comment 35.5: The fishery report in the Draft EIS places a lot of emphasis on a relatively unknown fish, the so-called redbanded trout. This species, if it is a separate one, appears to be highly adaptable and will certainly be around for some time to come.

Before far reaching decisions are made concerning management of the redbanded trout, it is imperative that much more study be made of it.

Response: Although redband trout are more adaptable to harsh environmental conditions than other trout species, it, like other trout, is vulnerable to habitat degradation. Loss of habitat and habitat degradation appear to cause small sizes of redband trout in many of the Owyhee streams. It has been shown that redband trout reach sizes of 16+ inches in a reservoir situation where habitat is not limiting. Also, sections of stream which have a good habitat condition contain a higher population of heavier trout. This compares to those sections of stream which are in poor condition and often contain marginal populations of redband trout and large numbers of rough fish. Studies have been underway on the life history of redband trout in the Owyhees on stream habitat factors, and on the genetic analysis of these trout. It appears from these studies that the trout are unique.

Comment 35.6: The impact of predators must be taken into account in the wildlife section of the EIS.

Response: We recognize predators play an important role in the rangeland ecosystem. The Draft EIS deals with significant impacts resulting from the proposed action and alternatives. No significant impacts upon predators were predicted; so predators are not addressed in the EIS.

Comment 35.7: Also, the natural cycle of wildlife is an acknowledged part of management, but it is unaddressed in the EIS Draft.

Response: The natural cycles of wildlife are recognized as influencing factors on populations. The condition of habitat has a direct affect on the fluctuations of any wildlife population. Good habitat conditions with more cover and forage available will lessen the degree of these fluctuations.

Comment 35.8: Juniper and brush invasion is the most serious management problem over much of the Owyhee Resource Area. I suggest that special emphasis be placed on the brush invasion study performed on the Owyhee by Burkhart and Tisdale in 1976.

Response: We agree that juniper and brush invasion is a serious management problem. The study by Burkhart and Tisdale lends credibility and support for the proposed burning program which would be a primary means of improving range condition and forage production on these areas.

Neil Rimbey - Extension Economist, University of Idaho

Comment 36.1: I have a report that summarizes the study which was done in cooperation with the Cattleman's Association in the Owyhee Resource Area that I would like to submit.

See Attached Study following the comment section.

Response: The economic study prepared by the bureau for the EIS was based on in-depth personal interviews with nine permittees. These were semi-random in that the district office compiled a list of permittees who they thought would have good records and be willing to participate in the study; those interviewed were randomly selected from that list. These budget interviews were completed under a contract with Abt Associates of Englewood, Colorado and by BLM personnel. In the summer of 1979 Abt completed six interviews and in the fall of 1979 BLM personnel completed the remaining three interviews.

The economic study done by the University of Idaho consisted of a mail-out questionaire which was returned by 48 permittees, of which 42 were useable. This study has a degree of bias built-in since it is not random and there is no incentive for permittees receiving small reductions to participate. Discussions with Neil Rimbey of the University of Idaho who prepared this study, indicate this is what happened. The majority of returns were from permittees scheduled for significant reductions. This study was conducted in the spring of 1980 and the results were not available until the hearings on this EIS.

During the course of the bureau's study, the only options mentioned for adjusting to AUM reductions was the purchase of additional hay. The University study found a number of other options may be available and the text of the EIS was changed to reflect this additional data (See text change section).

The bureau's study estimated 21 permittees would have difficulty remaining in business. Since the University only estimated thirteen permittees going out of business, no text change was made in this regard. No text change was made in the employment section since the University study projected 39 ranch jobs lost and the BLM study projected 36 jobs lost.

In his testimony on the EIS, Mr. Rimbey brought up several points which have been answered in this Final EIS; two text changes were made based on the presented material.

The remainder of the University study was considered in preparing this Final EIS, although no further text changes were determined to be necessary. Since the University study does have some built-in bias and Mr. Rimby, in his testimony on the Draft EIS, stated he would "not spend time quibbling over the figures" we felt our figures were more representative than the University's.

Comment 36.2: First and foremost, the authors seem to realize that the initial impact of grazing reductions will be substantial. However, statements concerning what will be in twenty years seem very hypothetical. It is not known that the proposed cultural practices will increase the number of AUMs by 63,781 or that "The total net income gain to area ranchers of 520,000 annually" would be possible.

Response: These long-term projections are the bureaus' best professional estimate of what will occur in twenty years. The National Environmental Policy Act requires that the long-term impacts of federal actions be estimated and analyzed.

Comment 36.3: The fact that the initial reductions may have substantial effects on area ranches and agricultural support industries does not receive the emphasis which should be accorded.

The Owyhee area economy relies heavily upon agriculture. Income and employee reductions will be felt across most sectors of the economy and may, in fact, change the local economy such that long-term predictions twenty years into the future, for example, may not be adequate using today's sectors and models.

For example, if the ranch sector suffers large reductions in income and some ranches face liquidation, what impact would this have on the support industries? I hypothesize that they will feel the impact, also, and the adjustment will not be as smooth as the authors of the draft convey.

In fact, with reduction in numbers of ranches, many service industries may be forced to cease operation. The initial impact may determine the economic future of the area. The absence of agricultural support industries may hinder the full utilization of this 63,781 AUMs which will be gained in twenty years.

Response: The three-county region studied is very dependent on agriculture. Row crop farming is the largest agricultural income producer in the region. Since the majority of ranchers do their shopping in Canyon or Malheur counties, losses to local business would be tempered by the continued business generated by the farming activity. It is true if the initial impact puts many ranchers out of business, there may not be full utilization of the increased AUMs after twenty years. (See text change section for corresponding changes).

Comment 36.4: Second, there is no attempt to account for the impact of the initial reductions on the private sector, on private sector items or activities such as land values, hay prices, and so on.

For example, increased demand for private pasture, hay, and other feed may substantially alter the existing price levels and therefore the financial situation of any ranches which are not facing reduction or are otherwise remaining in operation. This, in turn, may substantially change the economy of the area.

Response: This is a valid point. However, we do not have information to expand our economic impact analysis to consider these factors.

Comment 36.5: One of the more valuable aspects of the study that I'm presenting may be the reported actions which the cattlemen have reported and that they anticipate would result from the changes in grazing allotments. These are summarized in the paper and should be of use in revisions of the draft.

Response: This study was helpful in providing additional data for inclusion into the Final EIS. The section which addresses rancher reaction to AUM adjustments has been expanded. (see text change section).

Comment 36.6: Finally, I will quibble a bit with the employment projections over twenty years. I fail to see the recreational alternatives which will generate employment to replace those lost initially in the livestock industry.

Response: The increased income from recreation is based on the increased hunting and fishing days estimated in the recreation section of each alternative.

Dennis Swisher

Comment 37.1. This is a little mixed up, but in No. 5 it said there was no multiple use features in there, but range burning has multiple use features. It is good for the range if done properly; it is good for wildlife; it is good for livestock, and it's certainly good for your visual factors.

Response: We recognize that prescribed fire, if used properly with multiple use management objectives, can have beneficial effects on range condition, wildlife, livestock, visual, and other resources. However, the land treatments described in this alternative do not include multiple use management objectives. Any beneficial impacts on resources other than livestock forage would be coincidental and not predictable.

Comment 37.2: My license in my allotments is set up with forage allocation for wildlife. No. 5 said there was no forage allocation for wildlife, but mine has been set up with that already.

Response: The sentence should have read, "However, additional specific forage allocations would not be made." See text change section.

Comment 37.3: The erosion would be greater for a few years, but then the erosion in quite a lot of the welded tuff in Owyhee County is already terrific, always has been, and always will be terrific; that is its nature.

Response: According to available data, the present soil loss rate in the EIS area averages 1.12 tons per acre per year. The predicted impact to soil erosion represents the expected change from the present condition.

Comment 37.4: The Idaho Department of Health and Welfare ran a series of tests in a number of locations in the East Fork of the Owyhee and found the water very good at some test sites. It is also an excellent study and an education for someone like me.

Response: This study was reviewed and it was found to concur with inventory data presented in the Appendix for the East Fork of the Owyhee River.

John Miller - Miller Land Co. Inc.

Comment 39.1: In Allotment 574, total production is 1,257,430 pounds, of which 47,200 pounds is allotted to livestock. That figures out to 3.7 percent production to livetsock, and in 574 there's 43,469 pounds allotted to deer and antelope, which is almost what is alloted to livestock.

So my question there is why are the deer and antelope allotted almost as much as the livestock.

Response: In allotment 0574, vegetation production is 1,257,438 pounds of which 8 percent is grass (99,154 pounds), 7 percent forbs (87,714 pounds) and 85 percent shrubs (1,070,570 pounds). Based on 50 percent proper utilization, the pounds of allowable vegetation to all ungulates would be 49,577 of grass, 43,857 of forbs and 535,285 of shrubs. The percent composition of grasses, forbs, and shrubs is still the same.

The deer and antelope forage requirement in allotment 0574 is 43,469 pounds. However, of this total, the vegetative composition requirement is 16 percent grass (7,076 pounds), 32 percent forbs (13,919 pounds) and 52 percent shrubs (22,474 pounds). Using the method described in Appendix C under the subheading Allocation Example (page C-5), the wildlife requirements would be subtracted from the total available vegetation and the balance goes to livestock. In this case, livestock would have available 42,501 pounds of grass, 29,938 pounds of forbs, and 512,810 pounds of shrubs after the wildlife needs are subtracted. Then, based on the pounds of forage consumed by cattle for spring use (Table C-4), grass becomes the limiting factor, resulting in 59 AUMs. Therefore, in allotment 0574, pounds of grass, forbs and shrubs for the 59 livestock AUMs is 47,200 (59 x 800 = 47,200). Even though the deer and antelope total forage requirement almost equals the same amount allocated to livestock, the key is the composition of the vegetation in the allotment and the different dietary requirements of the ungulates using the area.

Comment 39.2: In Allotment 573 with intensive management can be raised from minus 61 per cent to a plus 27 per cent, and in Allotment 574 with intensive management can be raised from a minus 92 per cent to minus 76 per cent.

Why is there such a difference in the potential? The allotments are in the same area with the same soil, vegetation, and rainfall, so they should have the same potential.

Response: Allotment 574 is dominated by the shallow and very shallow ecological sites. These sites consist of shallow soils, with a low sagebrush overstory. Allotment 573 is dominated by loamy sites which have deeper soils and big sagebrush overstory. The loamy sites have higher potential forage production than the shallow sites.

Comment 39.3: The vegetation study was done in 1977, a drought year, and after I had a 100 percent use of my AUMs.

Response: The vegetation inventory method included making corrections to account for forage already consumed and for deviation from average precipitation. See Appendix F, Draft EIS.

Comment 39.4: I have been using the allotment at the full license and to me and others there seems to be, in the long run, no deterioration of the desired plant population. I would say the trend has been up in the condition of the range.

Response: The trend in allotments 573 and 574 is listed (Appendix Table F-5) as static or nonapparent. See Appendix F for condition and trend methods.

Comment 39.5: The economic impact of the proposed action would be disastrous to me. If there was land available and I could buy it at the present market price, it would cost $300,000 to replace the 1,428 AUMs with deeded land. Other alternatives would be to reduce my operation or to sell to a neighbor.

Response: If hay were purchased, it would cost approximately $50,000 a year to replace 1,428 lost AUMs. The difficulties faced by some ranchers are recognized in the EIS. The economics portion of each alternative estimates how many ranchers would have difficulty remaining in business.

Comment 39.6: I do not agree with the reduction figures I have in Allotment 574, and I request that they be corrected. It is by far the highest reduction proposed, and it makes me out to be the poorest manager in the area. I have heard people say that I have one of the best places in the area and that they would like to buy it, but the BLM makes it out as the poorest place in the Owyhee Resource Area.

Response: See Response 11.1.

Vernita Lowry

Comment 41.1: The proposed action and Alternatives 1, 3 and 4 will have adverse economic impacts and could result in the loss of many family operations. This loss of family operations will have many detrimental effects.

First, it will be harmful to the local communities; also, the impact will be felt in many other businesses and employment opportunities that they provide.

Response: The impact of grazing reductions on local business and opportunities is identified in the economics section of each alternative.

Comment 41.2: Secondly, this loss will, in time, have a detrimental effect on the wildlife, cultural, historical, and visual resources.

If these family operations fail, it will open the door to takeover by large corporate interests. It has been my experience that when this happens, many areas of our environment suffer. Neglect and gross misuse of the private and public lands is often the result.

Response: Corporations or other purchasers of existing family operations, like individuals, manage their lands differently. Some manage their resources quite well while others, as you have pointed out, manage them very poorly. Therefore, we do not have an objective basis to predict that a change in ownership would beneficially or adversely affect various resources.

Ernie Bahem - Owyhee Cattlemans Action Committee

Comment 42.1: The proposed action will greatly reduce the tax base of Owyhee County. Less than ten percent of Owyhee County is tax base, yet a great portion of the taxes provide services to government-owned land.

Response: The proposed action should have no impact on the tax base of Owyhee County. Although some ranchers may go out of business, their private lands will not go out of private ownership or off the tax rolls. In September 1979, Owyhee County received $287,000 "in lieu of taxes" payments from the federal government. These payments would not be affected by the proposed action or the alternatives under consideration.

Bill Lowry

Comment 43.1: Are the 81 springs, 90 reservoirs, 100 watering troughs, 24 miles of pipeline, and 153 miles of fence, are they new projects or are they upgrading of existing ones? And who would bear the financial costs and labor and maintenance of these projects?

Response: The proposed projects are new. Table 2-4 on page 2-11 of the Draft EIS shows the existing projects and the maintenance responsibility and cost. A sentence will be added on page 2-10 stating that, in the proposed action, the BLM would bear the cost of the new projects. See the text change section.

Comment 43.2: Is it possible at this time to spray or plow sagebrush land and reseed with some good grass such as crested wheat?

Response. It is possible to conduct these projects as described in the Draft EIS.

Comment 43.3: Getting down to the proposed action, on page ii, paragraph 5 reads in part: "16 miles of new fence would limit movement of horses and confine them during the livestock grazing season." Does this mean that during the nongrazing season for the domestic livestock that these wild horses would be cowboyed from field to field or allotment to allotment?

Response: When the livestock are out of the allotment, the gates would be left open, and the wild horses would move freely.

Comment 43.4: The last two lines of paragraph 2, page iii reads: "Approximately 21 of the 83 operators would have difficulty remaining in business."

Now, I think that figure could be higher as some ranchers are already working under a cut.

Response: Previous reductions have been accounted for by collecting current ranch budgets. These are the base from which impacts were measured. The impacts to the livestock industry and the local economy were analyzed and are discussed in the economics section of each alternative.

Comment 43.5: The second paragraph on page iv under "Environmental Consequences" reads: "Riparian and stream habitat conditions would remain poor. Associated wildlife species and fish populations would be adversely impacted by livestock grazing. Water quality would remain in poor or fair condition."

The wildlife population is largely regulated by fishing pressures, and as far as I know, a fish doesn't have any natural enemies except themselves and a coon. Also, I would have to state here that wildlife species population is governed as much by natural cycles and predators and hunting and fishing pressures as anything else.

Increased hunting pressure from an ever increasing population will certainly affect the wildlife population.

Response: Natural cycles, predators, and hunting and fishing pressure influence wildlife population dynamics. The intent of the EIS is to examine probable effects of the proposed grazing management program upon the environment, including wildlife populations. Since natural cycles, predators, and hunting and fishing pressures are not part of the proposed action or alternatives, their effects are not addressed. The effect of livestock grazing upon wildlife habitat can be substantial, as the inventory data presented in the EIS indicates in some parts of the Owyhee area.

Comment 43.6: The last paragraph of this alternative on page v states: "Approximately 25 of the 83 operators would have difficulty remaining in business."

Here again, that figure could be higher as we already have some operators that are operating under a reduction.

Response: See Response 43.4.

Comment 43.6: I think right here it should be stated that livestock, especially heavy livestock like cattle, will actually aid in controlling erosion especially in the steeper country. Cattle are what I would call contour grazers.

Nothing stops erosion during cloudbursts; it can move trees, boulders, the whole works, as we all know, but the contours that cattle will make in grazing around a hillside will also help check up the water from melting snows and just the natural rainfall, thus aiding in erosion control.

Response: A contour furrow will hold surface runoff and slow erosion. A contour trail made by cattle is compacted. Increasing soil compaction decreases infiltration rates and this increases overland flow. This overland flow may be channeled down the trail causing the water velocity to increase thus increasing its ability to carry sediment. Once the water leaves the trail it may form rills and gullies. As the water flows over the trail it may not alter the trail itself, but it may adversely affect the downhill sideslope due to the stored energy.

Comment 43.8: The last three sentences of the first paragraph reads: "Ranchers tend to make decisions based on noneconomic motives such as maintaining a way of life. High profit is frequently not their primary goal," and they're quoting a fellow by the names of Schultz in 1970 there. And, "It would appear that maintaining the ranching way of life is more important than maximizing profits." They're quoting a man by the name of Martin in 1968.

Well, I take exception to these statements. The rancher of today is a hardworking, no nonsense businessman. He has to be, with all the problems and elements he has to keep abreast of, marketing, taxes, legislation, diseases, and so forth, just to name a few.

Response: See Response 22.1.

Comment 43.9: Page 4-55, ranchers' income, the second paragraph reads: "To replace lost AUMs with purchased hay or hay held back from sale would cost permittees one and a half million dollars annually. This represents six percent of the regional farm income. On the other hand, it would be 88 per cent of the Owyhee County farm income."

Every operator would be forced out of business regardless of whether his ranch was free and clear or not because the remaining twelve percent won't pay the rest of the bills.

Response: It was estimated that 43 of the 83 operators would have difficulty remaining in business. There is no question that this alternative would have major impacts on the livestock industry and the local economy. Every operator would not, however, be forced out of business. Those operators with few BLM AUMs or a low dependence on the federal AUMs would not be severely impacted.

Comment 43.10: There would be an abrasive cow trail on one side or maybe both sides of these fences, and in some instances create traps or dead corners in a particular allotment.

Response: Abrasive cow trails would likely occur along the streams that are fenced. We do not anticipate that these trails will constitute or lead to significant environmental impacts. The dead corner or traps problems would be reduced with proper layout of the fences. See text change section.

Comment 43.11: The log structure could, and will in time, create log jams in the creeks which will cause washing of the streambanks, and in some cases, create new channels.

Response Only the tips of the log structures will be in the streambank area. It is anticipated that few of the log structures will wash out. These log structures have proven to be successful throughout eastern Oregon with only three percent of the log projects implemented resulting in failure. This failure occurred from the placement of log structures on stream meanders which will be avoided in the Owyhee project design.

Mrs. Bass for Dick Bass

Comment 44.1: I think it is appropriate now to give some misgivings on the fisheries and wilderness inasmuch as the so-called redband trout being listed as a "sensitive" species has not been determined as a species by any recognized authority.

Response See Response 22.2.

Comment 44.2: Also, I am in complete disagreement with the --- I can't say that --- anyway, Martin in 1968 and Schultz 1970. Their quoted statements are an insult to the ranching business and to me personally.

Response: See Response 22.1.

Daryl Keck

Comment 45.1: And the other contract was the financial deal on what was in the environmental draft, the ranchers that participated in that. Evidently it's got a better financial picture than most of us have had because it showed quite a profit to the ranchers, and the one that we just had completed from the University showed the true picture, and I'd sure hope you'd take that into consideration, and I understood it was presented as part of the evidence.

I think it really shows a much broader economic impact than the one that you have in the draft at this time. I hope that it can be used in place of that, or at least considered in place of it.

Response: This study has been considered in preparation of the Final EIS. See responses 36.1 through 36.6 for replies relative to the University of Idaho economic study.

35

ALTERNATIVE NO. 6

COOPERATIVE MULTIPLE-USE APPROACH

Prepared by

the

OWYHEE COUNTY CATTLEMENS' ASSOCIATION

and

BOISE DISTRICT

BUREAU OF LAND MANAGEMENT

SUMMARY

ALTERNATIVE NO. 6: Cooperative, Multiple-Use Approach

Vegetation would be allocated to livestock wild horses, deer, antelope and bighorn sheep, as in the proposed action. Wild horses would be managed within a range of 118 to 178 head. According to 1977 vegetation inventory, an apparent forage deficiency exists of approximately 34,786 AUMs below the total active grazing preference (31%) and 26,673 AUMs below the 1975-79 average use (24%).

It is planned that voluntary interim management actions (to limit forage utilization levels to 50% or less on native ranges) would result in improved range conditions.[1/] As a result, reductions in livestock use to the extent estimated in the proposed action, would not be required. When agreed to by the operators, those adjustments in livestock use which are required, would be made in accordance with a "Cooperative Management Plan" to be implemented over a period of five years through voluntary non-use taken by the operator based on data from additional actual use and utilization studies.[2/] In allotments where cooperative management agreements are not developed, adjustments would be implemented over a three-year period.

Voluntary Allotment Management Plans would be cooperatively developed between livestock operators, BLM and other federal, state, and local agencies and interests. BLM would assist range users, the state Land Department, Soil Conservation Service, and other agencies in developing grazing systems for the accomplishment of specific management goals on intermingled federal, state, and private lands.

[1/] This is a voluntary, interim measure to accelerate range improvement until a final management decision is rendered in 1982. A utilization level of 50-60% (moderate use) will assure improvement in range condition and also provides data to the true grazing capacity of the range.

[2/] "Voluntary non-use" would be implemented for any needed livestock adjustments instead of "suspended non-use" in the decision document. The permittee's license would not be affected. Decisions would be rendered by BLM through a voluntarily developed "Cooperative Management Plan". The "Cooperative Management Plan" would be appealable if not honored.

Riparian habitat would be carefully and specifically managed. Improvements would be planned as described in the proposed action.

ALTERNATIVE NO. 6: Environmental Consequences

The accelerated improvement in range condition would reduce competition for forage between wild horses, livestock, and wildlife at a more rapid rate than anticipated in the proposed action. Land treatment practices would reduce competition between livestock and wildlife. Increases in useable forage would be similar to the proposed action, but would take place over a two to eight year shorter time frame.

Wildlife habitat would benefit more than in the proposed action, and would be developed more rapidly through cooperative, coordinated planning, which would include much of the private and state land in that area. Wildlife habitat on private and state land provides as much as 50% of the deer, sagegrouse and waterfowl habitat in the area. Although some private land development would not be favorable to wildlife, the net effect would be an improvement over the proposed action.

Wild horses would be maintained at population levels similar to those existing at the time of passage of the 1971 Wild Horse and Burro Act.

Cultural and visual resources would be impacted as in the proposed action. Hunting, fishing and off-road vehicle activities would parallel the proposed action.

Reductions in livestock use would not be so severe as in the Proposed action.[3/] All operators participating in interim management which results in a stable or improving range condition trend would not receive livestock reductions provided range conditions remained stable or improved. Livestock operators would reduce livestock numbers and/or shorten seasons of use as required to implement and protect range improvements. The final decision document will officially underscore BLM and permittee management commitments.[4/]

[3/] This allows any operator to benefit from any improvement, whether or not he formally formulates a plan.

[4/] Final decision document and the agreements recorded therein by BLM are appealable.

Income losses would be significantly less than in the proposed action and of much shorter duration, resulting from the voluntary interim management.[5/] One of the goals of this alternative is to minimize the economic impact on the livestock operators and to remove the threat of forcing ranches out of business wherever possible.

[5/] The goal of voluntary interim management proposals is to accelerate range improvement and, hence, significantly reduce the negative financial impacts on range users in the final decision. Also, the Owyhee Cattlemen want the benefits to the range in much less than 20 years.

ALTERNATIVE 6

Cooperative, Multiple-Use Approach

This alternative combines the desirable features of the proposed action and Alternatives 2, 3, 4, and 5 with special management flexibility features which will encourage resource managers and range users to effectively deal with a wide variety of resource conditions.

Alternative No. 6 would decrease forage competition between wildlife, wild horses, and livestock. Conditions on native ranges would improve on most allotments. Soil and watershed conditions could improve. Wildlife habitat would improve and populations could increase.[6/] Livestock use on some allotments may be reduced initially, but would be returned to present use levels, or above, primarily as a result of increased forage production developed utilizing grazing systems designed to rapidly improve range condition on native range sites combined with land treatments designed to reduce forage competition between livestock wildlife, and other consumptive and non-consumptive uses.

Livestock grazing would utilize the presently available forage which is estimated based on the 1977 inventory to be between 78,300 and 105,009 AUMs.[7/] Actual production would vary depending upon grazing season and system of grazing management used.

Objectives

The objectives of Alternate No. 6 would be identical to the proposed action with the following additional goals:

1. To achieve a thriving ecological range condition in two to eight years sooner than in the proposed action by voluntarily

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[6/] Wildlife numbers are dependent on many factors other than habitat. Predators, poaching, and state hunting regulations are only a few factors which influence wildlife numbers. To merely improve habitat does not assure greater numbers.

[7/] See Management Framework Plan. Owyhee County Cattlemens' Association Action Committee determined that between 1900 and 1940, more than one million AUMs annually were utilized by cattle, sheep and domestic horses in the Owyhee Resource Area.

initiating sound management principles immediately rather than waiting for final Bureau action which could not be formally implemented until the 1982 grazing season. [8]

2. To promote cooperative resource management which recognizes the needs of all interests.
3. To promote coordinated voluntary ranch and allotment planning on all intermingled and associated land ownerships with the cooperation of private landowners, Idaho Department of Lands, Idaho Fish and Game Department, USDA Soil Conservation Service, and others as appropriate.
4. Provide for a program of continuous range improvement through the identification of long-range operations and maintenance responsiblities which will allow projects to be planned, carried out, and maintained in a systematic manner and which establishes target levels of vegetative condition and capability.
5. Recognize the need for maintaining a strong local food and fiber producing industry and thriving recreational opportunities for local citizens and visitors.
6. Recognize the importance of maintaining the present ranching society in Owyhee County and its associated low human population density upon which the future of desirable wildlife and recreational opportunities depend.

Vegetative Allocation

This alternative proposes no reduction in allocation of forage to wild horses and wildlife from the proposed action. It is anticipated that additional wildlife forage and habitat would be produced in a shorter time frame than in the proposed action through land treatments and implementation of voluntary rotation grazing systems which would reduce livestock impacts on wildlife. [9]

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[8] Some voluntary interim plans are underway. Others will commence soon. Under the BLM's proposed action, no management could be commenced until 1982 at the earliest, with some management withheld until 1987 or 1988.

[9] Research by Godfrey (Utah State University) indicates a substantial favorable response by native ranges (and wildlife habitat) in approximately 4 years following land treatments (seeding and brushing control) which allows deferment of native ranges due to extended grazing season-of-use on the treated areas.

Any needed adjustments in livestock use would be scheduled over a five-year period, in accordance with the Zimmerman Approach, after a careful review of actual use levels and studies of utilization levels of the key forage species in close cooperation and consultation with the appropriate permittee(s). [10]

1. Needed adjustments would be made utilizing changes in numbers or time, as mutually agreed to by the permittees and BLM. Imbalances in grazing capacities between fields will also be corrected wherever possible through season-of-use adjustments.
2. Whenever possible, incentives should be offered to livestock operators who make livestock adjustments utilizing voluntary nonuse.
3. The permittee and BLM would agree to a program of range improvement which would provide for both private and federal participation to insure restoration of livestock use to or above original levels in the shortest possible time frame.
4. Livestock use would be monitored annually by operators and BLM. At such time as range trend is improving, or stabilized, and utilization of key species is at the agreed upon levels, no further reductions would be required. [11]

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[10] The Zimmerman Approach allows for a 1- to 1½- period of consultation between BLM and the permittee prior to implementation of a management decision. Following the mutually agreed upon decision, there will be an annual review. The term of the initial decision would be 2 to 3 years, at which time it would be reviewed for effectiveness, re-negotiated and renewed for an additional period of time. Following the first 5 years, subsequent plans would follow a mutually agreed to term. Studies of range condition and trend would be conducted and reviewed annually by the permittee, BLM and other involved agencies and persons. Livestock adjustment would not occur on ranges which do not exhibit a downward trend if utilization levels are within the moderate range (50-60%), and the range is responding to management.

[11] Cook, Colorado State University, and the Society for Range Management, have stated that no accurate trend in range condition can be established in less than a 3- to 5-year period. Each AMP will have its own management objectives, desired utilization levels and key species. It is not desirable to tie all operations to a single or artificial standard. An example would be: Utilization of crested wheatgrass might be justified at levels as high as 70-80% to meet management objectives (to remove wolf plants; also heavy use of cheatgrass may be desirable).

Turnout Dates

Until intensive grazing systems are implemented and into the second grazing cycle, practicable turnout dates would be agreed to in the AMP and in interim agreements in order to encourage the most rapid improvement in range condition practical. Adherance to the recommended moderate utilization levels would result in desirable levels of plant residues which would provide additional forage for wildlife and winter protection for plant growing points, thus promoting earlier spring growth.

Areas traditionally used in the spring would be given deferment during the grazing season on alternate years. Such practices are particularly important in less intensive management areas. [12]

Livestock Grazing Management

This alternative endorses the discussion of grazing systems in the proposed action with the assurance that such systems will be developed in close consultation and cooperation with the permittee(s) and other user interests and landowners. BLM would assist permittees in the development of cooperative, coordinated, voluntary range management programs. [13] At the invitation of the permittee, state agencies, SCS, and other interests would participate.

Voluntary interim management and range improvement practices which do not violate conditions of the court action (NRDC vs. Morton) would be encouraged provided they do not conflict with final AMP goals. Utilization levels on those areas with no formal management plan, which exhibit low plant vigor, may be less than 50% and would

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[12] Deferment may be accomplished in several ways. Where agreed, fields may be divided by fences. In other cases, operators may accomplish deferment by herding, salting practices, or by withholding water. Individual operators would work out specific arrangements acceptable to their operational needs.

[13] Cooperative, coordinated management is at the discretion of the permittee. Appropriate agencies and interests may be invited to participate in a coordinated management program by the permittee. BLM would cooperate in such programs but has no authority to make decisions on private or state lands.

be determined cooperatively by BLM and permittee. Those units exhibiting adequate vigor or containing features which allow periodic grazing deferment or rest would be allowed higher utilization levels as required to achieve management objectives. [14] Areas of less intensive management under coordinated ranch and allotment plans would be included in the above criteria. [14]

In many grazing units within the Owyhee Resource Area, livestock operations are dependent upon significant use of private and state lands. The proposed action does not consider the capacities or the dependence upon state and private lands.

Interim management proposals and final Allotment Management Plans, to truly achieve desirable results, must include the use of those associated land ownerships. In units where voluntary cooperative, coordinated ranch and allotment plans [15] are initiated, which meet BLM allotment objectives, grazing utilization levels of up to 60% would be allowed and grazing capacities determined accordingly, rather than by biological limits. [16] Cooperative monitoring systems would be developed to insure proper utilization levels and to record range condition and trend data which support management decisions.

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[14] Time and manpower will prevent the immediate development of formally written coordinated management plans in each allotment. However, this alternative is designed to place improved management on the land as rapidly as possible. A grazing program may be developed by the permittee individually or with assistance from SCS or another state or federal agency and reviewed by BLM for compliance with management objectives. Those practices which are acceptable and which do not violate BLM regulations may be implemented. Utilization levels in those areas under systems which include deferment or rest would be much higher (50-60%) than areas under season-long grazing (Biological limits - 30 to 40% utilization).

[15] "Coordinated Ranch and Allotment Plans". This term refers to the name used by state and federal agencies and the Soil Conservation Service for management plans in which the permittee voluntarily incorporates private, state and federal lands into a single management plan.

[16] Grazing utilization levels will be tied to the target species or plant communities to be managed for in each specific field or allotment. In less intensively managed areas where voluntary interim management plans have been developed, the criteria sited in footnote 14, above, will apply.

Additional Management Measures

Riparian Habitat

Fencing to protect riparian habitat, sagegrouse meadows, etc., would be designed to create additional fields which would be included in the grazing management system. Those riparian areas, which can be fenced to form a pasture capable of special management, would be assigned a high priority. Those areas which do not lend themselves to formation of a special pasture would receive a low fencing priority, but would be grazed under a system designed to enhance riparian habitat.

Implementation and Maintenance of Range Improvements and Land Treatments

Specific improvement practices would be designed and scheduled cooperatively in the interim and allotment management planning processes. The Owyhee Cattlemen are concerned that present BLM policy does not contain adequate incentives to encourage private investments in range improvements, primarily because of inadequate credit or protection for those investments. In addtiion, new and innovative incentives for private implementation of range improvements and land treatments need to be developed.

In accordance with Section 12 of the Public Rangeland Improvement Act and Director Frank Gregg's Instruction Memorandum No. 80-470, dated April 23, 1980, it is requested that Owyhee County, in the Boise District, be designated an Experimental Stewardship Area without a chartered steering committee. The ad hoc Owyhee County Cattlemens' Association Action Committee would provide the necessary direction and coordination.

The purpose of the Experimental Stewardship Program in Owyhee County would be to assist the BLM in devising and testing innovative range resource management practices and incentives for encouraging participation and investment in range improvements by ranchers and local interest groups. From this process, hopefully, new BLM range improvement policies might emerge.

As an incentive to full participation in range improvements by livestock operators, all Range Betterment Funds (Fund 8100) collected would be returned to the District of origin. This would demonstrate the mutual spirit of cooperation proposed in this Alternative, and would maximize the amount of work to be accomplished.

Voluntary non-use would be utilized by permittees to insure protection of seedings and land treatments until they can safely be used. Responsibilities for development and maintenance for specific projects and treatments would be assigned in the Allotment Management Plan or through cooperative agreements. [17/]

[17/] Additional forage produced as a result of cooperative efforts by the permittee will first be allocated to the permittee's livestock up to the maximum of the permittee's Class 1 Preference. Forage produced in excess of the Class I Preference will be allocated proportionately among the resource uses in accordance with the Management Framework Plan. This is in accordance with BLM policy and has been recently been re-affirmed by Director Frank Gregg.

Authorized range improvements placed on federal land by permittees are encouraged. The Federal Land Policy and Management Act, the Public Rangelands Improvement Act, BLM Regulation and Policy, provide the following protection or incentives for private investments in range improvements:

1. Should the permittee lose his permit through no fault of his own, he may:
    a. Remove the improvements from federal land.
    b. Be reimbursed up to fair market value by the federal government.
    c. Be reimbursed up to fair market value by the successor-in-interest.
2. Under stewardship programs, as outlined in Section 12 of the Public Rangelands Improvement Act and in Director Gregg's Instruction Memorandum 80-470, the following incentives are provided for range improvements:
    a. The payment of up to 50% of the amount due the federal government for grazing fees in the form of a credit for improvement work.
    b. Sharing the benefits of improvements.
    c. Official recognition of good management to be placed in the permittee's permanent record.
    d. Other innovative incentives deemed appropriate.

The existence of an approved coordinated, cooperative management plan would provide the cooperating permittee with a greater position of security or tenure regarding his grazing permit than those permittees who choose not to become involved in innovative or accelerated management.

Land Treatments

The land treatments and criteria described in the proposed action appear satisfactory. Range seedings would be conducted on sites in poor, fair, or disturbed range condition with favorable soil and precipitation conditions. The primary objectives of range seedings would be to: 1) reduce competition between wildlife and livestock by increasing carrying capacity in specific areas, and 2) to extend spring use periods so as to enter summer ranges at later, more desirable stages of plant development.

Restrictions on land treatment should be modified as follows:

1. The prohibition of spraying and chaining in Class I or II VRM areas, or in areas under wilderness review, should be modified. Those areas which require treatment in order to meet Allotment Management Plan objectives, should be included for treatment. Obvious adjustments in ecological plant succession must be made when inaction would prove detrimental to overall management objectives or to specific range users.
2. Sagebrush spraying on deer summer ranges or sagegrouse areas would be allowed provided no significant negative impact on game species would occur.
3. Ground rig seeding apparatus would be allowed in Class I or II VRM areas, or in areas under wilderness review, provided the success of an Allotment Management Plan would be threatened without its use and provided that lasting VRM or wilderness impacts would be minimal.
4. Management Framework Plan, Step 3, and Environmental Analysis Records (EARs) would be used to evaluate and mitigate needed management which might conflict with Class I or II VRM objectives. The Owyhee Cattlemen and other interested citizens would assist BLM in working out reasonable solutions to VRM--Range Management conflicts.

Land Treatments, which would influence canopy cover on sagegrouse areas, would consider average canopy cover over sagegrouse use areas. Treatments would be prescribed at intervals which would allow for the availability of optimum cover at all times through sequential treatment and management as prescribed in the AMP.

The limitation of sagebrush spraying within one-fourth mile of riparian areas is impractical, particularly in rought terrain. Specific, on-the-ground criteria should be developed cooperatively between wildlife biologists and range managers for each project.

Standard Operating Procedures--Those recommended in the proposed action, are generally acceptable.

Some additional procedures include:

1. Close coordination should be maintained with the Owyhee County Historical Society and the State Historic Preservation Office when planning projects in high cultural resource site density areas.
2. The "nonimpairment" standard in areas under wilderness review would include new permanent range improvements, such as fences, spring developments, and small reservoirs, if they would not require motorized access should the area be designated as wilderness.

Monitoring Programs

Studies and evaluation procedures would be initiated in accordance with BLM Manual, Section 4412, [18/] in cooperation with range users to determine if the MFP and specific allotment objectives are being met. These studies would include compilation of actual use, range trend, range/watershed condition, watershed quality, utilization weather data, grazing capacity, and wildlife habitat conditions. The study site would be selected and read cooperatively with livestock operators and other interested agencies where possible. Where specific objectives are not met, adjustments in season-of-use, livestock numbers (including removal) or grazing systems would be made depending on the indicated need.

Utilization studies would be conducted during the grazing season on use pastures. When utilization reaches desired levels, livestock

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[18/] BLM must comply with BLM Manual, Section 4412. The only change the Owyhee Cattlemen have authority to suggest is that this process be conducted in cooperation with range users as provided for in the public Rangelands Improvement Act of 1978.

would be moved to the next pasture scheduled for grazing.[19] If utilization limits are reached in all pastures scheduled for use prior to the end of the scheduled grazing season, livestock would be removed from the allotment.

Utilization studies would be conducted using the key forage plant method (BLM Manual 4410).[20] This method establishes key vegetative species and key areas that would be monitored for utilization. Key areas would be selected to represent the majority of the grazing area within an allotment or pasture. Key areas would not be selected along stream bottoms or ridge tops. Key species to be monitored would include bitterbrush, Idaho fescue, and bluebunch wheatgrass. It is anticipated that utilization studies would require additional manpower needs of 30 work-months (five or six people during the summer months). A good portion of the additional manpower required might be contributed by range users following training by BLM personnel in the key forage plant method. Responsibility for conduct and recording of utilization studies would be spelled out in the Allotment Management Plan (AMP) or in a supplemental agreement.

Implementation Schedule

Adjustments in livestock use would be implemented within a five-year period as previously described in the forage allocation section. Required livestock reductions, whenever possible, would be carried out utilizing voluntary non-use as offered by the permittee. In return, BLM would agree to carry out, or to allow the range users to carry out, ecologically sound improvements designed to restore any reductions in an optimum time period. Considerable flexibility and understanding would be required on the part of users and BLM in the event federal funding for specific projects was unavailable. Alternate measures to improve range conditions would be jointly developed in such circumstances.

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[19] This paragraph is included with the understanding that such practices would be incorporated in the Allotment Management Plan of each individual permittee specifically to the needs of his allotment after close consultation between himself, BLM and other state and federal agencies which may be appropriate.

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[20] Refer to BLM Manual, Section 4410.

It is anticipated that water development and fencing would be completed within five years to allow all grazing systems to be functional by the 1986 grazing season.

Land treatment practices (brush control and seeding) would be completed and available for use as soon as practicable.[21] Subject to the availability of funds on the part of range users and BLM, and to the ability of livestock operators to withhold livestock from treatable sites, the maximum possible acreage of land treatments will be carried out on sites having the greatest productive potential during the first five-year period. Those practices which will yield smaller resource benefits will be carried out during the subsequent five-year periods. (Archaeological clearances would be accelerated accordingly.)

Cooperative monitoring programs for vegetation, water quality, wildlife, fisheries, and wild horses would be developed and implemented prior to adjusting present management.

Seeding of appropriate plant species would be planned following burns with less than desirable plant composition and density.

Condition and Trend

This alternative would provide at least the same benefits as the proposed action relative to range condition. It is anticipated that results would accrue over a shorter period due to increased participation by livestock operators commencing on a voluntary basis as much as two years earlier than as anticipated in the proposed action. Participation by range users would provide longer lasting benefits at less expense for development, operation, and maintenance. Due to reduced travel requirements, lower costs of labor and equipment, private users can usually install and maintain range improvements more economically than can an agency.

This alternative will emphasize management actions designed to improve plant vigor, i.e., periodic rest or deferment and turnout dates revised to more closely comply with plant grazing readiness.

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[21] It is anticipated that Alternative No. 6 would allow for completion of improvements at a more rapid rate than in the proposed action, because of the participation by permittees and through interim management and improvement programs voluntarily requested by permittees.

Comparative Analysis of Impacts

Alternative No. 6, the Cooperative, Multiple-Use Approach prepared by the range users in cooperation with BLM and other federal and state agencies, would combine the desirable features of the proposed action, Alternative Nos. 2, 3, 4, and 5, with special management flexibility features which will encourage resource managers and range users to effectively deal with a wide variety of resource conditions. As in the proposed action, forage competition between wildlife, wild horses, and livestock would decrease. Conditions on native range improve on most allotments at a more rapid rate than in the proposed action. Soil and watershed conditions would improve, also more rapidly.[6] Wildlife habitat would improve and populations could increase.[8] Livestock use would be somewhat reduced initially in problem areas, but would be increased to levels above present use in two to eight years less time than in the proposed action primarily as a result of increased forage production developed using grazing systems designed to rapidly improve range condition on native range sites combined with land treatments designed to reduce competition between livestock, wildlife, and other consumptive and non-consumptive uses.

Environmental Consequences

Special riparian management practices, including fencing, would be applied to as many as 64 miles of streams.

On 144 miles of stream, log structures would be placed along stream bottoms. The area identified for log structures would be all of the area proposed for fencing and log structures on Map 2-2.

Condition and Trend

A comparison of the proposed seasons-of-use (Appendix Table C-8) and the "average" plant readiness for grazing (Table 3-1) indicates the proposed turnout dates may be four to six weeks too early to provide adequate plant protection or seed dispersal in every year. Studies by Stoddart, et al (1975) indicate phenological stages varied as much as 36-47 days in central Utah and southeastern Idaho.

The improvement in plant vigor predicted from proposed grazing systems and stocking would be slower than anticipated because of the earlier turnout dates, however, Alternative No. 6 would emphasize management actions designed to improve plant vigor, i.e., periodic rest or deferment combined with turnout dates revised to more closely comply with plant grazing readiness.

Land Treatment

Seedings of appropriate plant species would be planned following burns with less than desirable plant composition and density.

Mitigation Measures

The voluntary inclusion by permittees of pastures containing private or state lands into the BLM's Allotment Management Plans would alleviate imbalances in a number of allotments. In many cases, forage imbalances which suggest livestock reductions would either be overcome or substantially reduced.

BLM policy does not allow the involuntary inclusion of private and state lands into AMPs. It is recommended that voluntary coordinated management programs be utilized wherever possible to maximize resource improvement on all ownerships.

Table 2-1

Vegetative Production and Use

ALTERNATIVE NO. 6

"Cooperative, Multiple-Use Approach"

Livestock	62,669,000/ 10% - 90,498,000/15%*
Deer	8,633,000/ 1%
Antelope	646,000/ 1%
Bighorn Sheep	100,000/ 1%
Wild Horses	2,136,000/ 1%
Non-Consumptive	538,756,000/ 88%
Total Annual Production:	612,940,000/100% - 640,771,000/100%

*The level of actual forage production is dependent upon seasonal variation and the success of cooperative grazing management practices. Production is related to plant vigor. Interim management practices which improve plant vigor will result in production at the higher levels of estimated production. Estimated production in the proposed action were computed on the basis of current vigor.

Table 2-2

Forage Consumption

Livestock	78,336 - 105,009
Deer & Antelope	2,152
Bighorn Sheep	-
Wild Horses	2,329
Total	82,817 - 109,490

36

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THE ECONOMIC IMPACT OF PROPOSED GRAZING CHANGES IN THE OWYHEE EIS AREA

Review Copy submitted to
the Owyhee's Cattlemen's Association

Tuesday, May 27, 1980

by

Neil R. Rimbey
Extension Economist

Introduction

In November, 1979, the Owyhee Cattlemen's Association approached the Owyhee County Cooperative Extension Service Agent, Leon Church, concerning assistance with the proposed Environmental Impact Statement (EIS) for the Owyhee Resource Area. Mr. Church contacted the Agricultural Economics Department at the University of Idaho requesting assistance. The author met with the Cattlemen's Association EIS Action Committee on November 27, 1979 and it was decided to devise a questionnaire to survey ranches in the area. A questionnaire was devised and discussed with a general meeting of the Cattlemen's Association on December 12, 1979. The questionnaire was revised after this meeting and sent to Mr. Church for mailing. The questionnaire was mailed to all permittees in the Owyhee Resource Area in January, 1980 by the Cattlemen's Association. The author met with ranchers in Murphy, Marsing and Jordan Valley on January 22-24, 1980. This was to meet with ranchers having questions concerning the survey and to pick up mail returns. At this time, there were approximately 23 returned questionnaires. The deadline for questionnaires was originally set for March 15, 1980 but was extended to April 15, 1980 so that 1979 Income Tax information would be included.

The extension of the deadline resulted in 48 questionnaires being returned. Six of the questionnaires were disregarded because of incomplete information, or the rancher having sold his/her operation. This left 42 usable returns. Appendix A contains a copy of the questionnaire.

Method

The 42 usable questionnaires were tabulated and analyzed to determine the costs of production, and estimated impact of proposed grazing changes on ranches in the area.

The returns were initially divided into four groups by number of cows.

Size Group	Number of Cows	Number of Permittees	Number in Sample	Percent of Total
1	0-149 cows	18	8	44%
2	150-399 cows	29	22	76%
3	400-699 cows	27*	6	22%
4	700+ cows	9*	6	67%
*estimates		Total	42	51%

This initial grouping was set because the returns showed a fairly obvious breaking point between numbers of cows at approximately 700 head. In other words, the returns showed one grouping ranging from 400 to 640 cows and another ranging from 820 to 2000 cows. Size groups 3 and 4 were later combined into one size group to allow comparison with Bureau of Land Management figures.

Estimates of costs and returns of production were derived for representative ranches in each of the four groups. These budgets, in conjunction with rancher responses to grazing alternatives, were used to derive estimates of the initial impact to area ranches.

The time constraint did not allow for consideration of the regional impact of the proposed action. However, work in this area is continuing and results will be reported at a later date.

Ranch Budgets

Ranch budgets for the four size groups are presented in Tables 1-4. Numbers of cows, calves and yearlings and bulls are given at the top of each table as well as the number of respondents in each size group, N.

All revenue figures are mean values of the responses in each size

group. The budget category "Other Income" is income earned by the operator, or family off the ranch.

Expenses are also mean values of size group responses with the exception of the item "Management Allowance". This is a figure used to denote a return to the operator for his managerial ability and is simply 5 percent of gross income.

Return on Investment is the difference between Gross Income and Total Expenses. Cost and revenue figures per cow have also been given in each table.

Table 5 shows the results of combining size groups 3 and 4 into one size group. It is presented here for illustration purposes and is not included in the analysis.

Analysis

The impacts to area ranches were estimated using the ranch budgets and responses by ranchers concerning their alternatives to public grazing. As mentioned earlier the impacts will be expressed as the initial effect. The multiplier effect which will be felt in other sectors of the economy has not been estimated because of the time constraint. However, this effect cannot be ignored in an agriculturally-based region such as the Owyhee Resource Area. The initial impact will be significant and it will spill over to other sectors of the economy. Additional analysis in this area is needed to derive effects on regional employment, income and output.

Questions 16 through 20 of the questionnaire (Appendix A) were designed so that ranchers could estimate what action they would take if a grazing cut were proposed for their allotment(s). Size group 1 operators responded

Table 1: Owyhee EIS Area Ranch Budget, Size 1, 1979

Cows = 118
Calves & Yearlings = 103
Bulls = 5
N = 8

Revenue		Per Cow
Calf Sales	$22,124.60	187.50
Yearling Sales	37,221.60	315.44
Cull Cow & Bull Sales	6,937.40	58.79
Other Livestock Sales	0.00	0.00
Crop Sales	21,765.00	184.45
Other Income	7,194.67	60.97
Gross Income	95,243.27	807.15
Cash Operating Expenses		
Feed	4,086.63	34.63
Grazing Fees & Pasture Rent	2,979.11	25.25
Seed	866.71	7.35
Fertilizer	3,556.14	30.14
Ag. Services (Vet.)	740.50	6.28
Irrigation	774.00	6.56
Repairs	2,373.63	20.12
Fuel	3,953.13	33.50
Supplies (Hardware, etc.)	1,192.17	10.10
Custom Work	2,672.50	22.65
Hired & Family Labor	10,520.91	89.16
Insurance	1,868.75	15.84
Sub-Total Cash Expenses	35,584.18	301.58
Overhead (legal, tax service, dues, magazines, etc.)	3,004.33	25.46
Taxes	1,503.50	12.74
Interest on Oper. Cap.	4,313.38	36.55
Livestock Purchased	5,486.33	46.49
Equipment	9,935.00	84.19
Other Expenses	8,690.50	76.65
Total Cash Oper. Exp.	68,517.22	580.65
Depreciation	10,643.57	90.20
Interest on Livestock, Buildings, Machinery	11,256.50	95.39
Operator Labor	6,562.00	55.61
Management Allowance	4,537.33	38.45
Total Expenses	101,516.62	860.31
Return on Investment	-6,273.35	-53.16

Table 2: Owyhee EIS Area Ranch Budget, Size 2, 1979

Cows = 235
Calves & Yearlings = 220
Bulls = 13
N = 22

Revenue		Per Cow
Calf Sales	$ 27,977.85	119.05
Yearling Sales	58,451.88	248.73
Cull Cow & Bull Sales	12,494.42	53.17
Other Livestock Sales	18,515.89	78.79
Crop Sales	8,795.88	37.43
Other Income	7,009.95	29.83
Gross Income	133,245.87	567.00
Cash Operating Expenses		
Feed	9,163.36	38.99
Grazing Fees & Pasture Rent	8,056.80	34.28
Seed	1,044.73	4.45
Fertilizer	4,057.67	17.27
Ag. Services (Vet.)	1,070.00	4.55
Irrigation	2,066.36	8.79
Repairs	3,696.86	15.73
Fuel	5,138.41	21.87
Supplies (Hardware, etc.)	1,149.78	4.89
Custom Work	8,142.14	34.65
Hired & Family Labor	21,273.14	90.52
Insurance	1,711.38	7.28
Sub-Total Cash Expenses	66,570.63	283.27
Overhead (legal, tax service, dues, magazines, etc.)	855.20	3.64
Taxes	1,962.70	8.35
Interest on Oper. Cap.	8,859.50	37.70
Livestock Purchased	8,355.17	35.55
Equipment	5,301.39	22.56
Other Expenses	8,863.17	37.72
Total Cash Oper. Exp.	100,767.76	428.80
Depreciation	11,175.91	47.56
Interest on Livestock, Buildings, Machinery	5,608.13	23.86
Operator Labor	8,401.00	35.75
Management Allowance	6,662.29	28.35
Total Expenses	132,615.09	564.32
Return on Investment	+ 630.78	2.68

Table 3: Owyhee EIS Area Ranch Budget, Size 3, 1979

Cows = 528
Calves & Yearlings = 501
Bulls = 28
N = 6

Revenue		Per Cow
Calf Sales	$ 37,603.17	71.22
Yearling Sales	80,077.09	151.66
Cull Cow & Bull Sales	53,229.14	100.81
Other Livestock Sales	3,228.03	6.11
Crop Sales	29,263.97	55.42
Other Income	2,850.00	5.40
Gross Income	206,251.40	390.63
Cash Operating Expenses		
Feed	12,540.60	23.75
Grazing Fees & Pasture Rent	14,058.30	26.63
Seed	1,623.20	3.07
Fertilizer	8,475.25	16.05
Ag. Services (Vet.)	2,126.17	4.03
Irrigation	2,951.00	5.59
Repairs	6,751.67	12.79
Fuel	8,451.33	16.01
Supplies (Hardware, etc.)	4,928.83	9.33
Custom Work	16,906.20	32.02
Hired & Family Labor	41,689.01	78.96
Insurance	2,085.00	3.95
Sub-Total Cash Expense	122,586.56	232.18
Overhead (legal, tax service, dues, magazines, etc.)	1,351.67	2.56
Taxes	3,743.00	7.09
Interest on Oper. Cap.	7,480.60	14.17
Livestock Purchased	8,000.00	15.15
Equipment	16,423.67	31.11
Other Expenses	12,290.67	23.28
Total Cash Oper. Exp.	171,876.18	325.52
Depreciation	20,086.25	38.04
Interest on Livestock, Buildings, Machinery	7,120.00	13.48
Operator Labor	10,086.00	19.10
Management Allowance	10,312.57	19.53
Total Expenses	219,481.00	415.68
Return on Investment	-13,229.60	-25.05

Table 4: Owyhee EIS Area Ranch Budget, Size 4, 1979

Cows = 1162
Calves & Yearlings = 812
Bulls = 62
N = 6

Revenue		Per Cow
Calf Sales	$ 62,021.60	53.37
Yearling Sales	105,568.50	90.85
Cull Cow & Bull Sales	47,849.80	41.18
Other Livestock Sales	42,066.67	36.20
Crop Sales	0.00	0.00
Other Income	10,000.00	8.61
Gross Income	267,506.57	230.21
Cash Operating Expenses		
Feed	43,502.50	37.44
Grazing Fees & Pasture Rent	37,487.20	32.26
Seed	2,500.00	2.15
Fertilizer	5,500.00	4.73
Ag. Services (Vet.)	3,203.17	2.76
Irrigation	2,333.33	2.01
Repairs	12,886.17	11.09
Fuel	7,306.17	6.29
Supplies (Hardware, etc.)	8,340.00	7.18
Custom Work	2,632.67	2.27
Hired & Family Labor	49,043.33	42.21
Insurance	4,088.50	3.52
Sub-Total Cash Expenses	178,823.04	153.91
Overhead (legal, tax service, dues, magazines, etc.)	921.20	.79
Taxes	4,137.00	3.56
Interest on Oper. Cap.	19,501.50	16.78
Livestock Purchased	12,216.67	10.51
Equipment	12,250.00	10.54
Other Expenses	15,106.17	13.00
Total Cash Oper. Exp.	242,955.58	209.08
Depreciation	16,250.00	13.98
Interest on Livestock, Buildings, Machinery	18,937.40	16.30
Operator Labor	9,981.64	8.59
Management Allowance	13,375.33	11.51
Total Expenses	301,499.95	259.47
Return on Investment	-33,993.38	-29.26

Table 5: Owyhee EIS Area Ranch Budget, Size 3, 1979

Cows = 845
Calves & Yearlings = 656
Bulls = 45
N = 12

Revenue		Per Cow
Calf Sales	$ 43,572.70	51.57
Yearling Sales	98,162.29	116.17
Cull Cow & Bull Sales	50,784.00	60.10
Other Livestock Sales	24,264.67	28.72
Crop Sales	12,946.60	15.32
Other Income	5,633.42	6.67
Gross Income	235,363.68	278.54
Cash Operating Expenses		
Feed	26,301.44	31.13
Grazing Fees & Pasture Rent	18,274.86	21.63
Seed	1,873.71	2.22
Fertilizer	7,483.50	8.86
Ag. Services (Vet.)	2,664.67	3.15
Irrigation	2,642.17	3.13
Repairs	9,818.92	11.62
Fuel	7,878.75	9.32
Supplies	6,479.36	7.67
Custom Work	11,553.63	13.67
Hired & Family Labor	45,134.67	53.41
Insurance	3,086.75	3.65
Sub-Total Cash Expenses	143,192.43	169.46
Overhead (legal, tax service, dues, magazines, etc.)	1,156.00	1.37
Taxes	3,987.00	4.72
Interest on Oper. Cap.	12,823.22	15.18
Livestock Purchased	11,162.50	13.21
Equipment	15,380.25	18.20
Other Expenses	11,553.63	13.67
Total Cash Oper. Exp.	199,255.03	235.80
Depreciation	18,807.50	22.26
Interest on Livestock, Buildings, Machinery	15,393.88	18.22
Operator Labor	10,017.18	11.85
Management Allowance	11,768.18	13.93
Total Expenses	255,241.77	302.06
Return on Investment	-19,878.09	-23.52

as follows:

25% of the ranches would reduce herd size by an average of 40 cows, 2 bulls and 40 calves/feeders.

13% of the ranches would purchase additional pasture - 15 acres at $100 per acre.

38% of the ranches would purchase additional feed - 140 tons at $62 per ton.

24% reported no change in their allotments. There were no liquidations or employee reductions reported.

It is possible to estimate the initial impact to size 1 ranches using the survey responses and the ranch budget for the representative size 1 operation. For example, 25% of the ranches would reduce herd and this would have the following impact:

Individual ranch gross income would decrease by $32,286 ($807.15 per cow X 40 cow reduction). Gross income loss to the five size 1 ranches who would reduce herd size would be $161,430 (5 ranches X $32,286 per ranch). Cash expenses would decline by $12,063.20 per ranch or a $60,316 decline in cash spending by size 1 ranches.

The 2 ranches which would purchase additional pasture would result in the following:

15 acres pasture X $100 per acre = $1500 total cost per ranch assuming 20% down payment, and 12% financing for 25 years, the annual cost of the additional pasture would be $153 per ranch or $306 increase in costs for the two size 1 ranches purchasing additional pasture.

The 7 ranches purchasing additional feed estimated a need of 140 tons of hay at an average cost of $62 per ton. This would result in $8680 of increased feed cost per ranch. The typical ranch currently is utilizing 860.38 AUM's at a cost of $1.89 per AUM. The ranch is facing a 26% reduction (221.40 AUM's) in AUM's. Grazing fees for 1980 are

scheduled to be $2.36 per AUM. Therefore, the ranch will see a decrease of $118.13 in grazing fees. The net increase in expenses would be $8561.87 per ranch ($8680 increased feed cost minus $118.13 decrease in grazing fees). The impact on the seven size 1 ranches purchasing feed would be $59,933.09 of increased costs.

An alternative approach would be to use the dry matter equivalent requirements to estimate hay needed to replace AUM's lost. For example, it is estimated that each animal would require 650 pounds of dry matter per month. This figure would convert to 71.96 tons of hay needed to replace the 221.4 AUM's which are to be cut. The net increase in hay costs would be $4558.95 ($65 per ton) per ranch or $31,912.65 for the seven size 1 ranches purchasing hay.

Loss of income to size 1 ranches is expected to be $221,669.09. Cash expenses, are expected to decline by $60,316. In other words, cash expenditures to local businesses-by size 1 ranches will decline by over $60,000.

Size 2 ranches face similar alternatives. Forty-one percent (12 ranches) of the ranches will reduce herd size by 157 cows, 7 bulls and 142 calves/feeders per ranch. Fifty-nine percent (17 ranches) of the operations would purchase 117 tons of hay at $76 per ton. Seven operations face liquidation and 2 operations which reduce herd size will also reduce hired labor by 1 employee each. The budgeting procedure followed in size 1 was also undertaken for size 2 ranches to derive the figures in Table 6. The typical size 2 ranch currently operates with 1855.32 AUM's and is facing cuts of 396.29 AUM's (21%). The ranch budget for the typical size 2 ranch is shown in Table 2.

Table 6: Impacts on Proposed Action on Area Ranches by Size

Size Group	Herd Reductions	Hay Buy	Hay Required	Pasture Buy	Cash Expenses	Liquid-ations	Employment Reductions (man-yrs.)
1	$ 161,430	$ 59,933.09	$ 31,912.65	$ 306	$ 60,316	0	0
2	1,068,228	150,088.92	141,242.57	0	533,680.68	7	9
3	1,891,430.82	73,928.97*	183,219.12	138,801.60*	1,124,215.56	5	13.5
4	691,320.63	21,321.16	102,200.86	0	462,191.73	1	18
Total	$3,812,409.45	$305,272.14	$458,575.20	$139,107.60	$2,117,947.55	13	39.5 man years

* These figures are alternatives to each other, i.e. size 3 ranchers will either purchase hay or purchase pasture.

Size 3 ranches will deal with proposed cuts by cutting herd size by 269 cows, 13 bulls and 223 calves/feeders. Sixty-seven percent of the ranches (18 operations) would reduce herd. Thirty-three percent (9 ranches) would purchase 100 tons of hay per ranch at $85 per ton or purchase 210 acres of pasture at $710 per acre. Five operations face liquidation and 8.5 employee reductions will result. Thirteen and a half man years of employment would be lost.

The typical size 3 ranch operates with 4298.97 AUM's and is facing cuts of 977.20 AUM's (23%). The ranch budget is given in Table 3. Initial impacts to size 3 ranches are given in Table 6.

The largest operations would cut herd size by 429 cows, 20 bulls and 301 calves/yearlings. Eighty-three percent of the ranches (7 operations) would make herd reductions. Two operations would purchase additional feed (250 tons at $55 per ton). One operation faces liquidation and 17 employees would be terminated. The typical size 4 ranch currently operates with 6307.34 AUM's and is facing reductions of 2565.20 AUM's (41%). The ranch budget is presented in Table 4 and Table 6 gives the estimated impacts to income and employment of the proposed action.

Total area ranch income will decline by $4,117,988. Thirteen ranches face liquidation and 39.5 man years of employment will be lost. This estimate uses rancher responses to grazing alternatives and does not consider the multiplier effect. Cash Expenses for feed, seed, repairs, supplies, etc., will decline by $2,117,948.

Considering the hay required using the dry matter per animal per month figure, income would decline by $4,271,291.

Replacing all 34,786 AUM's which are proposed to be cut with hay would require 11,305.45 tons and would cost area ranchers $734,854.

Summary

In summary, the impact of the proposed action on the Owyhee Resource Area economy will be substantial. Initial income losses of over $4 million and nearly 40 employees will be felt throughout the region's economy. The secondary effects on income and employment have not been explored in this paper due to a severe time constraint. Work will continue in this area and be reported in later papers. However, initial analysis points to the fact that area ranchers support local businesses much more than they purchase outside the region. This would point to a relatively large multiplier effect to other sectors of the economy.

General Comments on E.I.S.

The Owyhee Grazing Environmental Impact Statement Draft is by far one of the better drafts I have seen done in Idaho. I will not spend time quibbling over the figures. I do have some general comments concerning methodology.

First, and foremost, the authors seem to realize that the initial impact of grazing reductions will be substantial. However, statements concerning what will be in twenty years seem very hypothetical. It is not known that the proposed cultural practices will increase the number of AUM's by 63,781 or that "total net income gain to area ranchers of $520,000 annually" would be possible. The fact that the initial reductions may have substantial effects on area ranches and agricultural support industries does not receive the emphasis which should be accorded. The Owyhee Area economy relies very heavily upon agriculture. Income and employee

reductions will be felt across most sectors of the economy and may in fact change the local economy such that long term predictions (20 years in the future) may not be adequate using today's sectors and models. For example, if the ranch sector suffers large reductions in income and some ranches face liquidation, what impact will this have on the support industries? I hypothesize that they will feel the impact also and the adjustment will not be as smooth as the authors of the draft convey. In fact, with reductions in numbers of ranches, many service industries may be forced to cease operation. The initial impact may determine the economic future of the area. The absence of agricultural support industries may hinder the full utilization of the 63,781 AUM's which will be gained in twenty years.

Second, there is no attempt to account for the impact of the initial reductions on private sector items or activities such as land values, hay prices, etc. For example, increased demand for private pasture, hay and other feed may substantially alter the existing price levels and, therefore the financial situation of many ranches which are not facing reductions or are otherwise remaining in operation. This, in turn may substantially change the economy of the area.

Finally, I will quibble a bit with the employment projections over 20 years. I fail to see the recreational alternatives which will generate employment to replace those lost initially in the livestock industry.

OWYHEE RESOURCE AREA SURVEY

1. Name ____________________
   Address ____________________
   Name of Ranch ____________________
   Location ____________________

2. Type of Operation

   ______ Cow/calf ______ Cow/yearling

   ______ Other ____________________

   ____

3. Size of Operation:

   Number of cows ________
   Number of calves ________
   Number of bulls ________

4. Land Inventory

Total Land (Do not include land which is in a grazing association)

Acres Owned	Acres Rented	Rental Cost/Acre

Grazing Rights

AUM's	Source	Cost	Allotment #*

*If allotment is part of a grazing association, please identify association.

5. Months of year which public grazing is used:

Month	AUM's

Labor (includes operator and family)

6. Number of year round full-time employees ________
   Average number of hours per week worked ________
   Percent from local area ________

7. Number of year-round part-time employees ________
   Average number of hours per week worked ________
   Percent from local area ________

8. Number of seasonal employees ________
   Number of weeks seasonal workers are employed annually ________
   Percent from local area ________

9. Average hourly wages paid in 1979 to:
   Full time employees ________
   Part-time employees ________
   Seasonal employees ________

10. Total Annual Income derived by operator and spouse from off-ranch sources $________

11. Sales in 1979 of

    Calves $________
    Yearlings $________
    Cull Cows and Bulls $________
    Other Livestock or Livestock Products (Sheep, Horses - Specify) $________
    Crops $________
    Total Sales $________

11a. Sales made locally in 1979 to type of business:

Type of Business	Amount
Other Ranches or Farms	$
Feed and Seed	$
Other:	$
	$
	$

12. Expenses

    Total Production Expenses in 1979 $________
    Total Household Expenses in 1979 $________
    Total Depreciation Expenses in 1979 $________

PRODUCTION EXPENSES

Percent Purchases in Each Town

13. Expenses by Type	Ave. Yearly Amount	Marsing	Murphy	Caldwell	Nampa	Boise	Nyssa	Ontario	Other
Feed									
Seed									
Ag. Fertilizers & Chemicals									
Ag. Services (Vet & Breeding)									
Irrigation Equip.									
Equip. (Tractors, etc.)									
Repair Services									
Automotive (Cars, etc.)									
Gas, Oil, Other Petroleum									
Hardware									
Banking; borrowing Interest on Operating Capital Interest on Long term debt									
Insurance									
Legal & Tax Serv.									
Direct Purchases from other farms/ranches: feed & seed									
livestock									
custom work									
Other Expenses									

HOUSEHOLD EXPENSES

Percent Purchased in Each Town

14. Expenses by Type	Ave. Yearly Amount	Marsing	Murphy	Caldwell	Nampa	Boise	Nyssa	Ontario	Other
Food Products									
Clothing									
Furniture & Home Furnishing									
Construction									
Auto Sales & Auto Repair									
Gas & Oil									
Eating, Drinking, Recreation									
Banking, borrowing									
Insurance & Real Estate									
Doctor									
Dentist									
Legal									
Other Personal Services (Beauty Salon, Barber, Etc.)									

15. What changes in your grazing allotment have been proposed by the BLM:

a. Increase in allotment __________?

Number of AUM's increased __________

Percent increase __________

b. Decrease in allotment __________?

Number of AUM's decreased __________

Percent decrease __________

c. No change __________

IF A DECREASE HAS BEEN PROPOSED, please answer the following questions:

16. Are these reductions in addition to other recent reductions? Yes_____ No_____
If so, how much was your allotment reduced and when did this take place?

17. Do you plan to maintain the same number of animals?

Yes_____ No_____

18. If you reduce herd size, by how much will you reduce it?

_____Cows _____Bulls _____Calves/feeders

19. If you reduce herd size, will you also reduce the amount of hired labor you use (if you currently have hired labor?)

No_____ Yes_____ How much will reduction be?

Number of workers __________

Weeks per year __________

20. If you plan to maintain the same number of animals, how will you do it?

a. Rent or lease additional private pasture?

No_____ Yes_____

Is private pasture available? No_____ Yes_____

How much will you need? __________acres

How much do you estimate it will cost? $__________per acre $__________per AUM

b. Increase private-owned pasture:

by purchasing pasture? No_____ Yes_____

by converting existing cropland to pasture? No_____ Yes_____

How much will you need? __________acres

How much do you estimate it will cost? $__________per acre

c. Do you own unimproved land which can be improved to pasture quality? No_____ Yes_____

How much land is available? __________acres

How much would you estimate this will cost? $__________per acre

Do you have Desert Entry or Carey Act opportunities to convert unimproved land to pasture? No_____ Yes_____

d. Can you consolidate ownership with neighboring properties to maintain the economic unit? No_____ Yes_____

How many acres would you need to acquire to maintain operation at or above present levels?

__________acres or units

Estimate the high and low capital expenditures of such action __________

e. Purchase additional feed?

No_____ Yes_____

How much will you need? __________tons

How much do you estimate this will cost at today's prices? $__________per ton

21. Other comments:

Thank you for your time and cooperation.

TEXT CHANGES

Page 2-9

DESCRIPTION OF THE PROPOSED ACTION (Comment 13.1). Add the following sentences to the paragraph that ends before Table 2-3:

> Of the 64 stream miles identified for special riparian management, approximately 60 percent would incorporate some level of livestock grazing through development of special riparian management pastures. On the remaining 40 percent, livestock grazing would be excluded immediately through fencing.
>
> If the objective of achieving fair habitat condition in five years and good condition in ten years, is not being met, livestock grazing would be excluded as necessary.

Page 2-10

DESCRIPTION OF THE PROPOSED ACTION (Comment 43.1). Add the following sentence to the end of the first paragraph under Implementation and Maintenance of Range Improvements and Land Treatments: "The BLM would bear the costs of the new projects."

Page 2-12

Project Development and Design Criteria (Comment 43.10). Add the following sentence to the end of the "Fence Construction" paragraph: All fences would be laid out to minimize the potential problem of cattle congregating in dead ends that could be formed where the fence intersects with other fences or natural barriers.

Page 2-14

DESCRIPTION OF PROPOSED ACTION (Comment 6.10). Replace the last sentence of the first paragraph with the following: The Idaho Department of Fish and Game will be given the opportunity to review and comment on proposals for chemical treatment. The responsibility for the decision whether to undertake vegetative manipulation projects rests solely with the BLM.

Page 2-17

Standard Operating Procedures (Comment 25.4). Add standard operating procedure number 11: Where wildlife and/or wild horses become dependent on water sources on public land, those sources would be left open for their use.

Monitoring Programs (Comment 19.3). Add to first paragraph in monitoring section: The water quality and fisheries habitat elements that were measured during the stream inventory (Appendix K) would be continued. Streams with high grazing conflicts and which have specific management actions related to attainment of fisheries habitat objectives would receive monitoring priority.

Page 2-26

ALTERNATIVE 5 (Comment 37.2). Change the last sentence of the fifth paragraph to read, "However, additional specific forage allocations would not be made."

Page 2-31

INTERRELATIONSHIPS (Comment 5.1). Add the following paragraph after Idaho Department of Fish and Game: Oregon Department of Fish and Wildlife.

The Oregon Department of Fish and Wildlife would be asked to review and comment on vegetation manipulations proposed by the Boise District for public land in Oregon.

Page 2-33

INTERRELATIONSHIPS - Include the following page which was ommitted from the Draft EIS:

formation of the MFP. No conflicts with county planning were identified.

Private Land

Approximately 246,000 acres of private land are located within allotment boundaries. That portion in the intensive management allotments (132,000 acres) and less intensive management allotments (21,000 acres) would be directly affected. Lands in the intensive management category would be subject to the proposed grazing management of BLM ranges because their intermingled location makes separate management impracticable. A cooperative or integrated "Ranch Plan" with the permittees, SCS, State of Idaho and BLM is recommended for allotments with predominantly private or state land (less intensive management category).

Grazing use of public lands is dependent upon the capability of private lands to sustain livestock during early spring until the forage on public lands is ready for grazing. Private lands along the drainage bottoms have been used primarily for the production of forage crops to sustain livestock operations through winter months. Most of the private lands are dependent upon additional federal or state lands to sustain a yearlong cattle operation.

Page 3-3

VEGETATION (Comment 2.2). Correct Table 3-1 to read as follows:

Table 3-1
Average Plant Grazing Readiness
Dates by Elevation for Selected Species[1]

Elevation (Feet)	Sandberg bluegrass	Bottlebrush squirreltail	Bluebunch wheatgrass	Idaho fescue	Antelope bitterbrush
3,000	4-21	4-28	4-28	[2]	[2]
4,000	5-7	5-14	5-14	5-21	5-21
5,000	5-21	5-28	5-28	6-7	6-7
6,000	6-7	6-14	6-14	6-21	6-21

[1] Spring grazing before this date would be during the critical growth period of the plant (based on BLM phenology studies conducted in 1977 and 1978 in the Owyhee Resource Area).

[2] No data available.

Page 3-34

SOCIAL CONDITIONS (Comment 22.1). Delete the last four sentences of the first paragraph under Social Values and Attitudes.

Page 4-21

WILDLIFE Table 4-8

Following 2,000-WT, Less Intensive Mgmt, add---(adverse) in the Impact on Habitat Column.

Pages 4-21, 4-24, and 4-26

WILDLIFE Tables 4-8, 9, 10 (Comment 32.1)

Management with Private Lands Category

Under Impact on Habitat - change unknown to + (slightly beneficial).

Under Remarks - Replace remarks with the following:

Management of the scattered public lands in these allotments would be generally controlled by private landowners. Based on the anticipated vegetation improvements due to the reduction of AUM usage, a slightly beneficial response to habitat condition would be expected.

Page 4-22

WILDLIFE

Move the last sentence of the second paragraph to the end of the first paragraph.

Page 4-45

ECONOMICS (Comment 36.5)

Change the second paragraph to read:

"There are several courses of action ranchers might take to adjust to the AUM reductions. In a recent study by the University of Idaho, area ranchers indicated they would (1) reduce herd size, (2) purchase additional feed, (3) purchase additional pasture, or (4) reduce herd size and reduce hired labor. The following analysis is based on the substitution of purchased feed (hay) for Bureau of Land Management AUMs and vice versa. This was done since this generally represents the most expensive method for adjusting to the reductions. Changes in AUM levels are measured against the five-year average actual use levels since that is the number of AUMs the ranchers are currently utilizing.

Page 4-47

ECONOMICS (Comment 36.3)

Add to the end of the first paragraph. "If a large number of permittees are put out of business in the early years of the proposed action, full utilization of these additional AUMs may not be made. If this was the case, the net annual income gain would be smaller than shown here."

ECONOMICS (Comment 24.7)

Add the following paragraph to the end of the rancher income section.

In years of below normal production because of drought, fire, insect invasion or other unforeseen reasons, the initial annual income losses would be greater than those indicated. Ranchers would be required to provide additional forage on private land if livestock were removed from the range when moderate use was reached. At this time, it is not possible to predict the extent or the frequency of such adjustments.

Page 4-52

SOCIAL CONDITIONS (Comment 16.4)

Delete the last sentence of the third paragraph and the last sentence of the summary paragraph.

Page A-1

Appendix A (Comments 21.1, 21.8 and 21.9)

Overall MFP guidance, constraints, goals and objectives are documented in BLM Manuals 1602 and 1603. For each program activity such as range management, the bureau has developed planning assumptions, long-term objectives, and major principles and standards by which activity objectives are to be obtained. Within this framework, objectives and rationale are prepared which maximize the resource opportunities as developed through the unit resource analysis process. Objectives can also be developed to meet specific needs which have been identified through a scoping or issue identification process. All objectives must conform to bureau policy and applicable laws and regulations. Single-use recommendations and rationale are developed for each objective. These clearly define the specific course of action needed to achieve the objective or a measure of it. Multiple use resource recommendations are next developed through a multiple use analysis process (impact analyses, determination of alternatives, etc.). The proposed action for the Owyhee Grazing EIS is essentially a combination of these multiple use recommendations which are range related or closely associated or impacted by the range recommendations. MFP III decisions are made after consideration of the impacts of the proposed action and alternatives as described in the EIS.

Thus, general management objectives, constraints and guidelines, and specific activity recommendations for each resource value have been established in the Owyhee MFP and are available for review at the Boise District Office. All objectives and recommendations which can be considered within the scope of a grazing EIS are provided within the document (i.e., for objectives see pages 2-1, 2-2 and refer to Appendix Table A-1 for range and wildlife single-use recommendations and multiple use recommendations with rationale and trade-offs). Other objectives and recommendations are not listed in the EIS. They are however, considered during the multiple use analysis of the recommendations listed and readily available for review in the MFP.

General guidance for the range program is found in BLM Manual 1603.12b. Five planning assumptions are provided, one of which is as follows:

> "Open range livestock ranching in the West will continue to be an important segment of the U.S. meat production industry, and demands for forage will continue."

The long-term objectives are to manage livestock and wild horse use which would:

a. Achieve multiple use objectives identified through a multiple use planning process, and can be attained by applying rangeland management techniques. These objectives would include improvement of environmental values.

b. Provide forage to help meet needs of the nation, to help stabilize the economy of the livestock industry, individual users, and dependent communities. Seven major principles and standards are given, one of which follows:

"Proper management of livestock grazing would be accomplished through Allotment Management Plans (AMPs) to the extent practical. AMPs would be designed at a high quality level to accomplish objectives of all related program activities as set forth in MFPs, to the extent these objectives could be achieved through livestock management."

The guidance in the URA 4 for range management in part says "identify and document all technologically feasible opportunities to increase vegetative production and range use, and to improve range conditions for domestic livestock....consider both natural potential and potential through land treatment," etc.

The guidance for developing MFP range objectives is found in BLM Manual 1608.35A and says in part "establish objectives over time periods in quantifiable terms such as AUMs, acres of improved and maintained condition, and implementing numbers of AMPs."

In the Owyhee MFP, four range management objectives and rationale were developed dealing with (1) the development of better range management techniques (2) improvement of vegetative condition (3) the protection and management of wild horses and (4) the protection and enhancement of rare and endangered plants.

Correspondingly, objectives 1, 2, 8, 11 and 12 as listed on pages 2-1 and 2-2 in the grazing EIS are directly related to Range Management objectives 1, 2, 3 and 4 and rationale as found in the Owyhee MFP. Appendix Table A-1 lists the primary single use recommendations on how to achieve the stated objectives, the other MFP single-use recommendations which conflict and the resultant multiple-use recommendation/rationale and trade-offs.

The rationale for objective 3 on page 2-1 of the EIS dealing with habitat stream improvement is given in the MFP under Wildlife-Aquatic objective 2 and as modified by other resource values as shown in Appendix Table A-1, 8 and 9.

The rationales for objectives 4, 5, 6 and 7 on page 2-2 of the EIS dealing with the wildlife habitat and herd numbers are found in the MFP under Wildlife objectives 1, 2, 4, 5 and 7 respectively. All big game population goals are derived by BLM after coordination with the Idaho Department of Fish and Game. These numbers include consideration of historical population levels and future management goals. As mentioned, the EIS population projections and management guidelines are consistent with those recommended in the MFP. Detailed recommendations and rationales for all wildlife and fisheries species occupying the EIS area are presented in the Owyhee URA/MFP.

As mentioned previously for range management, general planning assumptions, long-term objectives, and principles and standards for each of the other program activities are given in BLM Manual 1602-1608, but are too voluminous to repeat in each MFP or EIS document.

Page B-3

Appendix B: Delete - Callaway-Allotment 627.

Page C-11

Appendix Table C-8. Errors on the original table have been corrected. The entire page has been reprinted and is included at the end of the Text Change section.

Page D-1

Appendix Table D-1. Add six miles of pasture fence to allotment 551.

Pages R-1 through R-9

Add to References

Kitchen, D. 1974. Social behavior and ecology of the pronghorn. Monogr. 38. 96 pp.

Klebenow, D.A. & G.M. Gray. 1967. Food habits of juvenile sage grouse. 20th Annual Meeting. Am. Society of Range Mgmt. Pp. 80-83.

Reynolds, T.D., 1978. The response of native vertebrate populations to different land practices on the Idaho National Engineering site, ecological studies on the Idaho National Engineering Laboratory site. 1978 Progress Report, pp. 171-189.

Oakleaf, 1971. The relationships of sage grouse to upland meadows in Nevada. Job Final Report Fed. Aid Proj. w-48-2 Nev. Dept., Fish & Game 64 pp.

Hickey, Wayne C. Jr., (undated). A discussion of grazing management systems and some pertinent literature. (Abstracts and Excerpts) 1895-1966, USDA Forest Service, Denver, Colorado.

Appendix Table C-8
Existing and Proposed Livestock Use

Allot. No.	Land Ownership (Acres)				Season-of-Use Limit		Grazing Systems		Livestock Class	Livestock Use (AUMs)			
	BLM	State	Private	Total	Existing	Proposed	Existing	Proposed		Active Pref.	5-Year Licensed AUM	Proposed	% Change[1]
Intensive Management													
0450	4,023.4	----	630.0	4,653.4	4/16-11/15	5/1-10/31	SL	2DR(SP-SU-F)	C	360	360	298	-17
0500	28,540.4	9,083.8	824.0	38,448.2	4/8-6/15	5/1-6/30	2DR	3RR(SP)	C	4,478	5,990	1,870	-58
0501	18,140.7	1,020.0	182.0	19,342.7	6/16-9/30	6/16-9/30	SL	2DR(SU-F)	C,H	1,788	1,654	723	-60
0502	3,904.6	----	32.0	3,936.6	5/1-9/30	5/16-9/30	SL	2DR(SP-SU-F)	C	800	313	181	-77
0503	17,265.8	640.0	6,853.1	24,758.9	4/16-12/15	5/1-9/30	SL	S-L,SP-D 2DR(SU-F)	C,S	3,344	2,657	1,259	-62
0505	6,135.4	519.2	2,336.4	8,991.0	4/1-11/30	5/1-9/30	SL	3RR(SP-SU-F)	C,H	446	468	931	+109
0506	22,008.9	7,408.3	8,463.6	37,880.8	4/1-10/31	5/1-10/31	SL	2RR(SP) 2DR(SU-F)	C,S,H	3,547	3,586	1,387	-61
0507	1,932.7	640.0	817.9	3,390.6	4/1-9/30	4/16-9/30	SL	3RR(SP-SU-F)	C	439	439	161	-63
0508	39,649.1	1,923.9	1,014.6	42,587.6	4/1-9/15	4/16-10/31	7DR	7DR(SP-SU-F)	C	4,274	4,412	4,699	+10
0509	1,577.0	----	38.9	1,615.9	4/16-6/15	5/1-9/30	SL	2/3SR	C	169	170	217	+28
0513	10,069.0	200.0	1,833.4	12,102.4	4/1-5/20	4/16-6/15	SL	2DR(SP) 3RR(SP)	C,S,H	267	338	308	+15
0514	6,357.9	----	2.0	6,359.9	4/1-5/20	4/16-6/15	SL	3RR(SP)	C,S,H	1,250	438	996	-20
0515	13,012.3	1,278.0	4,127.7	18,418.0	5/21-11/15	5/21-10/31	2DR	2DR(SP-SU-F)	C	1,276	2,056	1,578	+24
0516	16,608.4	1,237.0	2,374.7	20,220.1	4/1-10/31	4/16-10/31	3DR	2RR(SP) 2DR(SU-F)	C	1,712	1,980	1,726	+1
0517	67,504.0	3,675.0	2,669.0	73,848.0	4/1-10/31	4/16-8/20	7DR	4DR 3RR(SP)	C,H	4,720	4,596	3,825	-19
0518	4,626.9	----	4.0	4,630.9	4/1-6/10	4/16-10/31	SL	3RR(SP-SU-F)	C,S,H	1,459	1,326	827	-43
0519	11,423.5	998.2	240.0	12,661.7	4/1-12/15	4/16-10/31	SL	3RR(SP-SU-F)	C,S,H	1,750	1,126	1,093	-38
0521	13,915.8	1,280.0	1,545.1	16,740.9	4/1-10/31	4/16-8/20	4DR	2RR(SP) S-L,SP-D	C,S,H	1,694	1,642	1,180	-30
0522	5,537.0	640.0	----	6,177.0	4/1-5/30	4/16-6/15	SL	3RR(SP)	C	651	650	300	-54
0525	7,199.5	5.0	----	7,204.5	6/1-11/30	4/16-10/31	SL	3RR(SP-SU-F)	C,S	886	884	929	+5
0526	5,670.3	1,065.0	1,974.0	8,709.3	5/1-5/31	5/1-5/31	SL	2DR(SP)	S	274	102	162	-41
0529	3,396.2	----	64.0	3,460.2	4/1-9/30	5/11-9/30	SL	3RR(SP-SU-F)	C,H	726	742	322	-56
0530	1,541.0	----	----	1,541.0	4/1-9/15	4/16-9/30	SL	3RR(SP-SU-F)	C	180	181	656	+264
0531	5,798.9	957.0	378.0	7,133.9	4/16-9/15	5/1-9/30	SL	3RR(SP-SU-F)	C	1,699	1,700	587	-65
0532	25,696.7	1,280.0	2,790.3	29,767.0	4/16-6/15	4/16-6/15	SL	3RR(SP)	C	2,725	2,092	2,490	-9
0533	6,105.0	490.0	1,411,1	8,006.1	6/16-9/18	6/16-10/31	SL	3DR	C	1,609	1,400	500	-69
0534	3,666.0	----	265.0	3,931.0	7/10-9/18	6/16-10-31	SL	3DR	C	743	638	408	-45
0535	50,721.0	1,920.0	12,826.4	65,467.4	10/1-2/28	10/1-2/15	SL	D(F-W)	C,H	2,262	1,900	2,662	+18
0536	4,138.5	----	23.0	4,161.5	8/1-9/30	6/16-9/30	SL	2DR(SU-F)	C	374	374	231	-38
0539	98,843.6	5,170.0	3,241.5	107,255.1	4/16-9/22	4/16-9-30	3RR 4DR	2DR(SU-F) 3RR(SP)1-DAS	C,H	7,338	7,081	5,030	-31
0540	44,402.8	3,218.0	190.0	47,810.8	4/1-11/31	4/16-9/30	4DR	1DAS 3RR(SP)	C	3,726	4,199	2,289	-38
0541	38,961.0	2,481.0	2,356.7	43,798.7	4/16-10/9	4/16-10/31	5DR	3RR(SP-SU-F) 2DR(SP)	C	4,345	3,736	3,420	-21
0542	1,637.5	160.0	----	1,797.5	11/1-11/30	6-16/9-30	SL	1D(SP & F)	C	87	87	167	+92
0546	13,920.9	900.0	2,820.8	17,641.7	5/16-10/31	5/16-10/31	SL	2RR(SP)1-DAS	C	1,020	927	756	-26
0548	34,529.8	2,210.0	5,515.6	42,255.4	5/1-10/31	5/1-10/31	SL	3RR(SP-SU-F)	C	2,935	2,989	3,212	+9
0549	5,028.2	640.0	1,019.3	6,687.5	4/16-11/15	5/1-10/31	SL	3RR(SP-SU-F)	C	356	357	266	-25
0550	8,471.0	645.7	1,602.6	10,719.3	5/1-10/31	5/1-10/31	SL	3RR(SP-SU-F)	C	400	399	446	+12
0551	20,698.5	944.6	440.0	22,083.1	3/25-6/30	5/1-6/30	SL	1RR 2DR(SP)	C	1,200	1,200	906	-25
0552	1,776.0	----	151.0	1,927.0	4/1-7/31	5/1-8/31	SL	2DR(SP-SU-F)	C,H	139	138	120	-14
0553	657.8	1,410.0	25.0	2,092.8	4/1-7/31	4/16-8/31	SL	2DR(SP-SU-F)	C	128	128	98	-23
0554	15,752.5	1,222.0	440.0	17,414.5	4/16-9/30	5/1-9/30	SL	2RR(SP) 3RR(SP-SU-F)	C	2,412	2,413	771	-68
0556	10,845.6	638.7	2,256.5	13,740.8	5/22-9/30	5/1-10/31	2RR(SP) 1D(SU&F)	1-DAS 3RR(SP)	C	1,532	1,473	1,621	+6
0557	1,443.6	----	31.0	1,474.6	4/16-9/15	5/1-10/31	SL	S-L, SP-D	C	255	255	84	-67
0562	3,416.4	----	680.0	4,096.4	4/16-11/15	6/1-9/30	SL	3DR	C	229	200	320	+40
0563	4,669.7	----	148.0	4,817.7	4/1-11/15	4/16-6/30	SL	2DR(SP)	C	985	891	855	-13
0565	13,526.4	635.0	47.5	14,208.9	4/1-9/30	4/1-10/31	3DR	1DAS 2DR(SP & F)	C,S,H	2,410	2,383	2,181	-10
0568	3,383.5	130.0	775.4	4,288.9	4/16-5/31	4/16-6/15	SL	2DR(SP)	C	113	113	145	+28
0569	48,236.2	2,910.8	8,053.8	59,200.8	4/1-11/15	4/16-10/31	SL	2RR(SP) 2DR(SU-F)	C,H	6,329	4,950	3,289	-48
0570	8,643.3	4,383.4	6,332.5	19,359.2	7/1-9/30	7/1-10/31	SL	2DR(SU-F)	C,H	1,127	1,109	1,204	+7
0571	29,401.6	455.8	13,018.7	42,876.1	11/1-1/31	11/1-1/31	SL	D(F-W)	C	1,491	1,491	1,925	+29
0572	1,088.1	18.0	404.3	1,510.4	4/16-8/15	5/1-10/31	SL	2DR(SP-SU-F)	C	212	212	128	-40
0573	9,532.3	3,178.8	824.5	13,535.6	6/16-10/15	6/16-9/30	SL	2DR(SU-F)	C	2,013	2,014	784	-61
0574	2,635.6	----	25.0	2,660.6	5/1-6/15	5/16-6/15	SL	2RR(SP)	C	774	774	59	-92
0578	9,857.1	300.0	3,594.3	13,751.4	11/15-2/28	10/1-1/31	SL	D(F-W)	C	839	852	561	-33
0579	11,420.8	640.0	1,965.8	14,026.6	4/1-10/31	4/16-10/31	3RR 2DR	3DR 2DR(SU-F)	C	1,463	1,363	1,337	-9
0580	14,352.7	2,034.0	4,714.6	21,101.3	7/1-9/30	6/1-9/30	SL	2DR(SU-F)	C	2,378	2,379	908	-62
0581	7,743.5	58.0	2,748.3	10,549.8	4/16-11/30	5/1-9/30	SL	2RR(SP)	C,H	925	823	515	-44
0585	4,108.3	----	30.0	4,138.3	4/15-6/15	4/16-10/31	SL	2DR(SP & F)	C	1,057	716	682	-35
0587	10,199.3	4,814.9	384.2	15,398.4	5/1-10/31	5/16-10/31	SL	4RR	C	2,271	1,169	688	-70
0588	14,368.0	1,280.0	640.0	16,288.0	4/1-7/31	4/16-6/30	SL	2RR(SP)	C	2,710	2,420	1,817	-33
0589	10,931.0	1,562.0	7,835.4	20,328.4	6/1-9/30	6/1-10/31	SL	2DR(SU-F)	C	2,103	1,180	904	-57
0590	2,512.8	----	160.0	2,672.8	10/1-10/31	7/1-10/31	SL	1-DAS	C	664	480	230	-65
0593	3,667.3	100.0	115.0	3,882.3	10/1-11/30	7/1-11/30	SL	1-DAS	C	90	90	212	+136
0595	4,368.0	245.0	1,662.0	6,275.0	7/1-10/31	7/1-9/30	SL	1D	C	600	538	526	-12
0597	1,635.5	----	290.0	1,925.5	4/1-6/30	5/1-9/30	SL	2DR(SP-SU-F)	C	200	220	355	+78
0599	14,961.1	4,455.1	30.0	19,446.2	5/1-12/31	5/1-10/31	SL	3RR(SP-SU-F)	C	1,754	1,163	601	-66
0600	2,635.0	50.0	243.0	2,928.0	4/16-6/15	5/1-9/30	SL	2/3 SR	C	143	215	333	+133
0601	6,323.8	640.0	3,501.8	10,465.6	6/16-9/30	5/16-10/31	SL	2DR(SP & F)	C	1,208	1,258	236	-80
0602	4,765.7	----	----	4,765.7	5/1-11/15	5/16-10/31	SL	2DR(SP & F)	C	695	630	222	-68
0603	7,759.7	230.0	40.0	8,029.7	4/1-5/31	4/16-6/30	SL	2DR(SP)	C,S,H	853	886	842	-1
Subtotal	959,277.4	84,021.2	132,074.3	1,175,372.9						107,411	100,115	73,551	-32

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